



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

KHSAA Form T76  
Rev..11/16

|                    |                                     |
|--------------------|-------------------------------------|
| School:            | Ohio County                         |
| Prepared By:       | Gary W. Lawson                      |
| Date of Re-Visit:  | October 24, 2019                    |
| Staff Reviewed By: | Darren Bilberry, Asst. Commissioner |
| School Year:       | 2019-2020                           |

**ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:**

|  |                     |
|--|---------------------|
| <b>OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT)</b>                    | <b>Completed</b>    |
| <b>Test One</b> – Substantial Proportionality                                  |                     |
| <b>Test Two</b> – History of Continuing Practice of Program Expansion          |                     |
| <b>Test Three</b> – Full and Effective Accommodation of Interest and Abilities | <b>Satisfactory</b> |
| <b>Analysis Form Review</b>  | X                   |

**ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES:** The February 15, 2006 Title IX school visit report rated the accommodation of student interests and abilities *Satisfactory* based on information indicating that the standards established by both Tests 2 and 3 for the provision of athletic opportunities were being met at that time. The January 23, 2014 visit report rated this area *Deficient*. There was no evidence provided to show that any of the three opportunities tests were being met. The school failed to meet Test 3 because there was no documentation that the indicated interest in bowling (37) girls was pursued for validity. A review of the annual Title IX reports for the past two years gives strong indication that the standard established by Test 3 is currently being met. Since the time of the 2014 visit, the school has added programs in archery and bowling. Both the internal report summaries for 2017-18 and 2018-19 document that information on the T-3 form is supported by the data in the most recent student athletic interest survey. The T-63 form in the 2017-18 annual Title IX report shows that an 81.9% completion rate was received on the most recent student athletic interest survey. During the most recent school visit, the Title IX file was examined. It contained the three previous Title IX school visit reports, annual Title IX reports for the past five years, an extra service pay schedule for coaches (see *Coaching* and *KHSAA Recommended Action*), a listing of the current members of the Gender Equity Review Committee, current game schedules for all varsity teams, a school-generated athletic handbook for student athletes, a booster club agreement, facility usage schedules for all shared athletic venues, regulations addressing awards and recognition of athletic accomplishments, designation of the locker room and athletic equipment storage space assigned each team, minutes and agendas for GERC meetings held during the past three years, a uniform review, rotation, and/or replacement plan, and some general statements addressing who pays for travel and per diem for student athletes. (See *Travel and Per Diem Allowances* and *KHSAA Recommended Action*.) School officials were commended for the development of a well-organized and user-friendly 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 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. All the uniforms and equipment seen during the most recent visit were of excellent quality and appeared to be supplied in equitable quantities. A uniform review/replacement plan showed that all varsity teams were on a three-year cycle of replacement except boys and girls golf, archery, boys and girls tennis, boys and girls swimming, bass fishing, boys and girls track and boys and girls cross country which are replaced annually. Interviews with coaches and student athletes seemed to confirm adherence to this plan. The 2017-18 and 2018-19 annual Title IX reports show that the school was spending \$165 per female athlete and \$215 per male 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 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. In 2014, no event schedules were provided for boys or girls cross country and no practice schedule was provided for the soccer fields shared by the boys and girls teams. Information confirmed by the athletic director during the most recent visit showed that the number of competitive events scheduled for teams of "like" sports was comparable. Facility usage schedules showing equitable access for both genders were available for the gym, weight training room, soccer fields, and the indoor hitting facility. The scheduling of competitive events during optimal playing times on an equitable basis was discussed with school officials who were encouraged to make this effort a priority.

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

**BENEFITS REVIEW- TRAVEL AND PER DIEM:** Both the 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The 2014 report requested that written regulations in this area be expanded to include the equitable provision of mode of transportation. At the time of the most recent school visit, the Title IX file had some vague statements addressing the group(s) responsible for paying for travel and per diem for student athletes. These statements do not offer guidance or parameters for the provision of parity in regard to this benefit. (See *KHSAA Recommended Action*.) The expenditures submitted for this benefit category on the T-35 form in the 2018-19 annual Title IX report appeared to be incomplete and/or in error. During the most recent visit, school officials confirmed that expenditures were both incomplete and incorrect. The school's lack of written regulations addressing equity in this benefit category, and the submittal of inaccurate expenditures which prohibits evaluation of spending renders this category **deficient**. (See *KHSAA Recommended Action*.)

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

**BENEFITS REVIEW- COACHING:** The 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The 2014 report documented that the number of coaches listed for some teams on the T-35 form was incorrect. School officials also stated during that visit that some coaches, whose positions were not listed on the district's extra service pay schedules, were compensated by the board of education. During the most recent school visit, it was learned that the athletic director is responsible for the evaluation of all head coaches. A written instrument is currently used for documentation of this process. The extra service pay schedule made available during the visit appeared incomplete and did not allow a full analysis of salaries paid to coaches of "like" sports. There was also a lack of clarity concerning whether or not the board of education actually compensated some coaches at some levels. (See *KHSAA Recommended Action*.) The T-35 form in the 2018-19 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 12.5 participants per coach and 12 participants per coach for male athletes. The athletic director shared data showing that 67% (6/9) of the head coaches of girls teams and 60% (6/10) of the head coaches of boys teams are on-campus employees.

| <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 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The practice and competitive facilities at this school are very well-maintained and appointed. The locker rooms, practice and competitive facilities are generally rated as excellent. The amenities at the indoor and outdoor facilities appear to be comparable per gender. There was a listing of the locker room space assigned each team in the Title IX file. There was a slight advantage to the male teams in the number of *exclusive* locker rooms, but there was no sharing of any locker room space during the same season. All the locker rooms were large enough to accommodate the assigned teams, and they seemed to provide a very safe and secure environment for all participants. There seemed to be an adequate amount of well-organized and maintained athletic equipment storage space that was assigned with appropriate consideration of the size of the teams and the proximity of their competitive and practice facilities.

| <b>BENEFIT</b>                                      | <b>Satisfactory</b> | <b>Deficient</b>         |
|---|---------------------|--------------------------|
| <b>MEDICAL AND TRAINING FACILITIES AND SERVICES</b> | X                   |                          |
| <b>INDIVIDUAL COMPONENTS</b>                        | <b>Acceptable</b>   | <b>Needs Improvement</b> |
| 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 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The tour of facilities during the most recent visit revealed that there was a large and well-equipped weight training room at the athletic fieldhouse. This venue is easily accessible and has training options suitable for use by females. 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 widespread use of the facility as well as equitable access. Access to an athletic trainer is available daily on an equitable basis through a contract with Ohio County Health, Inc. Free physical examinations are given to any student athletes on two designated days each summer by a group of local physicians.

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

**BENEFITS REVIEW- PUBLICITY:** The 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The 2014 report requested that guidelines in this benefit category be expanded to specifically address equitable provision of awards and the posting of athletic recognition for individuals and teams in the public areas of the school. There is currently one varsity cheerleading squad assigned to cheer at all home football games. They also cheer at all home boys and girls basketball games and at away games versus district opponents for both teams. The school band performs at all home football games. The pep band plays at all home boys and girls basketball games except when those games are played on Saturday nights. A local radio station broadcasts all home and away football and home and away girls' and boys' basketball games. The station also broadcasts all home softball and baseball games. There were regulations in the Title IX file for the posting of banners recognizing athletic accomplishments and the provision of letters. These regulations seem to set parameters for parity. The guidelines in the file addressing the provision of awards and banquets should be reviewed by the GERC and updated to be more realistic considering the demands on the athletic director and school administrators. The 2017-18 and 2018-19 annual Title IX reports show that \$33 per female and \$17 per male athlete was spent for awards and recognition. This spending appears to favor female participants.

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

**BENEFITS REVIEW- SUPPORT SERVICES:** The 2006 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The tour of facilities during the most recent visit revealed that there is exclusive office space for seven school teams and shared office space for six teams. These offices are all well-maintained and have equitable amenities. The space seems to be assigned with parity as a priority. The school currently has booster clubs supporting all teams. These booster clubs all house their funds outside of school accounts, and, according to administrators, there is no process in place for oversight or approval of booster spending in regard to the provision of equitable benefits. Various methods to monitor this situation were discussed with school officials and the Gender Equity Review Committee. An analysis of athletic spending for the past two years shows that total expenditures for 2017-18 and 2018-19 favored the underrepresented gender—female participants on both a percentage and per athlete basis. (See *Internal Analysis Summary* in the 2017-18 and 2018-19 annual Title IX reports.)

**Note:** This analysis includes expenditures for travel and per diem which are incomplete and likely inaccurate.



**PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING**

| Name              | Title                           |
|-------------------|---------------------------------|
| Gary W. Lawson    | KHSAA                           |
| Elijah Decker     | Student Athlete                 |
| Kelsey Kennedy    | Student Athlete                 |
| Amy Lambert       | Volleyball Coach/Parent/Teacher |
| Matt Brigance     | Girls Basketball Coach          |
| Christy Nofsinger | District Title IX Coordinator   |
| Paul Decker       | Assistant Principal             |
| Alex Embry        | Athletic Director               |
| Jess Stevens      | Teacher/Coach                   |
| Kasady Stevens    | Bookkeeper                      |
| Jennifer Phelps   | Guidance Counselor/Parent       |
| Chelsea Atherton  | Teacher                         |

**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 made available during this visit was comprehensive and venue-specific as requested by the statute.

As per request, the school was asked to identify the locations of its Automated External Defibrillators. According to the athletic director, there are permanent AED's located: (1) in the front school lobby on wall, (2) in the baseball equipment room, (3) in the soccer concession stand, (4) in the football concession stand, (5) in the back right corner of the wrestling room, (6) on the wall of the main entrance hallway of the athletic fieldhouse, and (7) on the back wall of the "break room" in the vocational school.

No one from the community attended the Public Comments session. Both Mr. Embry, athletic director, and Ms. Lambert, assistant to the athletic director, were commended for the preparation for the school visit. The meeting was adjourned at 4:20 pm EDT.