

KHSAA TITLE IX RE-VISIT FIELD VISIT REPORT

School:	Portland Christian
Prepared By:	Gary W. Lawson
Date of Re-Visit:	October 30, 2017
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2017-18

ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:

OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT)	DEFICIENT	Completed
Test One – Substantial Proportionality		
Test Two – History of Continuing Practice of Program Expansion		
Test Three – Full and Effective Accommodation of Interest and Abilities		
Analysis Form Review		Х

ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES: Both the April 8, 2003 and the September 15, 2011 Title IX school visit reports rated this area Satisfactory. At the time of those two visits, it appeared the school was meeting the standards established by Tests 1 and 3 for the provision of athletic opportunities. A review of information submitted in the annual Title IX reports for the past two years does not provide evidence that the school is currently meeting the standard of any of the three opportunities test. The 2015-16 Title IX annual status report showed that the school was meeting the standard of Test 2 because five girls' teams with a total of 35 participants had been added during the past five years. The 2016-17 report showed that only one team (junior varsity cross country) remained as an addition. The other four teams had either been dropped or the five-year statute of limitations had expired. Both the 2015-16 and 2016-17 status reports alerted the school that the T-63 form (summary of Student Athletic Interest survey) contained errors which prohibited full evaluation in regard to Test 3. The errors on the T-63 form in the 2015-16 report were not corrected in any follow-up submittal to KHSAA or in the 2016-17 annual report. Failure to meet the standard of any of the opportunities tests renders the school to be deficient in Accommodations of Interest and Abilities. (See KHSAA Recommended Action.) School officials were reminded that failure to provide equitable opportunities for student participation has been designated the most serious deficiency within the Title IX evaluation. It should also be noted as part of the opportunities area, that no minutes for any Gender Equity Review Committee meetings were provided in 2003, 2011, or 2017. School administrators and the members of the current committee were given notice of the need for this group to be a functioning entity. It was emphasized to school officials that regular meetings with written minutes was a requirement. (See KHSAA Recommended Action.) During the most recent school visit, the Title IX file was examined and found to contain the two previous Title IX school visit reports, copies of the annual Title IX reports for the past five years, a listing of the current members of the Gender Equity Review Committee, game schedules for all varsity teams, a school-generated handbook for student athletes, a written set of by-laws for the athletic booster club, a facility usage schedule for the gym, written guidelines regarding awards and recognition of athletic accomplishments (see Publicity), a uniform review, rotation, and/or replacement plan, a written policy addressing travel and per diem, and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). School officials were requested to work toward the development of a comprehensive Title IX file.

BENEFITS REVIEW

BENEFIT	Satisfactory	Deficient
EQUIPMENT AND SUPPLIES	Х	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Uniform review / replacement plan	Х	
Status of uniforms and equipment	Х	
Equity of spending	Х	

BENEFITS REVIEW- EQUIPMENT AND SUPPLIES: The 2003 and 2011 Title IX school visit reports deemed this benefit category *Satisfactory*. The 2011 report documented that there was a slight disparity in the quality of uniforms provided for the softball and baseball teams. The most recent visit revealed that the school had a uniform review, rotation, and/or replacement plan based on a two-year cycle of review for all teams. Interviews with student athletes appeared to support adherence to the plan. All the uniforms examined during the recent visit seemed to be of mid-to-high quality and to be supplied on an equitable basis except in the case of baseball and softball. Both the quality and quantity of uniforms provided seemed to favor female athletes who were designated as the underrepresented gender in athletics at the school during 2016-17. According to data in the 2015-16 and 2016-17 annual Title IX reports, the school was spending approximately \$144 per female athlete and \$81 per male athlete for equipment and supplies.

BENEFIT	Satisfactory	Deficient
SCHEDULING OF GAMES AND PRACTICE TIMES	Х	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Like sports scheduling	Х	
Scheduling of shared practice facilities	Х	
Optimal playing times	Х	

BENEFITS REVIEW- SCHEDULING OF GAMES AND PRACTICE TIMES: The two previous Title IX school visit reports 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. An equitable usage schedule was provided for the gym which is currently the only venue shared by male and female athletes in which separate practice times are necessary. The scheduling of athletic events during the most opportune playing times was discussed with school officials who were commended for continuing to strive for parity in this endeavor.

BENEFIT	Satisfactory	Deficient
TRAVEL AND PER DIEM	Х	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Mode of transportation	Х	
Provision for meals and housing	NA	
Equity of spending	NA	

BENEFITS REVIEW- TRAVEL AND PER DIEM: Both the 2003 and 2011 Title IX school visit reports rated this benefit category *Satisfactory* At the time of the 2011 visit, the school provided <u>no</u> transportation or per diem for any student athlete. The current policy for this benefit category found in the Title IX file documents that (1) all transportation to/from athletic events and practice is provided by the parents of athletes except on <u>very rare</u> occasions when the coach of a team drives the school van to supplement parental transportation and (2) the school provides <u>no meals or lodging</u> to student athletes and overnight trips are funded totally by parents of athletes. As this policy indicates, no travel expenditures have been reported by the school in the annual Title IX reports for the past two years.

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

BENEFITS REVIEW- COACHING: The two previous Title IX school visit reports deemed this benefit category *Satisfactory.* At the time of both school visits, no individual received monetary compensation for coaching at Portland Christian High School. The athletic director evaluates all head coaches, and a written instrument is not a used as a part of this process. At this time, there still is no monetary compensation for coaches. Data gathered during the most recent visit revealed that the coaching ratio for female athletes is 7.5 participants per coach and 9.0 participants per coach for male athletes. Information provided by the athletic director indicated that 50% (2/4) of the head coaches of girls teams and 20% (1/5) of the head coaches of boys teams were on-campus employees.

BENEFIT	Satisfactory	Deficient
LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES	Х	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Competition and practice venues	Х	
Dressing areas	Х	
Equipment storage areas	Х	

BENEFITS REVIEW- LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES: The two previous Title IX school visit reports rated this benefit category Satisfactory. During the most recent visit, the school did not have a written listing of the locker room and equipment storage space for teams in the Title IX file. (See KHSAA Recommended Action.) The tour of facilities revealed that the only on-campus venue is the gym which is used by boys' and girls' basketball and volleyball. The boys' and girls' cross country teams practice at Seneca Park located about five miles from the school. All competitive meets for both teams are held at the away school's venue. The golf team practices and competes at the Seneca Park course about five miles from the school. Boys soccer practices at the Sojourn church which is about three miles from the school. All of this team's competitive events are held at the away school. The softball team practices and competes at field 2 at the E.P. Tom Sawyer Park about four miles from the school. The baseball team practices at the Waggoner High School field (when it is available) which is about four miles from the school. All baseball games are scheduled to be played away. All the facilities reviewed appeared to provide relatively equitable amenities. All the school-sponsored teams, except golf (which dresses at the course) dress in classrooms. Classroom 6 is used for all girls' teams and classroom 7 is used for all boys' teams. These rooms are adjacent to the gym and school restrooms. Both rooms seem to offer privacy and security. The school has very limited athletic equipment storage space. The two areas currently being used are the back of the concession stand which is assigned to boys and girls basketball and volleyball and two closets in the office of the athletic director which are assigned to softball, baseball, girls and boys cross country, and boys soccer. This limited space appears to be assigned equitably. The school currently has no space designated as coaching offices.

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

BENEFITS REVIEW- MEDICAL AND TRAINING FACILITIES AND SERVICES: The 2003 and 2011 Title IX school visit reports rated this benefit category *Satisfactory*. At the time of these visits, the school had no weight training facility, no athletic trainer, and did not provide physical examinations for any athletes. The most recent tour of facilities revealed that the school still has no weight training room or any fitness training equipment. The school does have a part-time athletic trainer from Indiana University Southeast. This trainer seemed to be equally accessible to all athletes. Students are responsible for getting their own athletic physical examinations.

BENEFIT	Satisfactory	Deficient
PUBLICITY	Х	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Support group assignments	Х	
Written regulation for recognition	Х	
Equity of spending		Х

BENEFITS REVIEW- PUBLICITY: The two earlier Title IX school visit reports rated this benefit category *Satisfactory.* The 2011 report requested that the school develop and implement regulations for the posting of athletic recognition (i.e. banners and retired jerseys) and the provision of athletic awards. The school currently has one cheerleading squad that is assigned to cheer at an equal number of boys and girls home and away basketball games. The school's athletic director is required to monitor the number of games at which cheerleaders support the teams in order to insure parity. The school does not have a pep band. The Title IX file contained equitable regulations regarding posting of athletic banners and the provision of athletic awards. UPON RECEIPT OF THIS REPORT, THESE REGULATIONS SHOULD BE EXPANDED TO INCLUDE THE EQUITABLE PROVISION OF POST SEASON BANQUETS. Spending within this category could not be accurately analyzed because of the likelihood of an error in reporting on the T-35 form in regard to spending for awards for volleyball. A reported expenditure of \$1,230 for volleyball awards on the T-35 form in the 2016-17 annual Title IX report could not be explained by school officials. (See *KHSAA Recommended Action*.)

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

BENEFITS REVIEW- SUPPORT SERVICES: The 2003 Title IX school visit report rendered this benefit category *Deficient* based on the information provided by the school showing that the total athletic spending significantly favored male athletes during the school years 2000-2001 and 2001-2002. The 2011 report rated this benefit category *Satisfactory* based on evidence in annual reports that showed athletic spending actually favored females during the 2009-2010 and 2010-2011 school years. Currently, the school has one athletic booster club which supports all school-sponsored teams. This club deposits all of its funds into school accounts. Administrators approve all expenditures from the school accounts. A major means of support for the athletic program is a fee of \$100 which is paid by students for each sport in which he/she participates. Information in the 2015-16 annual Title IX report shows that athletic spending was within generally accepted parameters for the provision of parity for a non-football playing school. Approximately \$101 per female athlete and \$73 per male athlete was spent for total support. In 2016-17, the spending favored female athletes (underrepresented gender). According to data submitted, approximately \$162 per female athlete and \$83 per male athlete was spent.

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	
(Accommodation of Interest and Abilities)	The school's 2017-18 annual Title IX report is to show evidence that the standard established in <u>at least one</u> of the three tests for provision of opportunities is being met. The T-63 form (Student Athletic Interest Survey summary) is to be complete and correct in that report.	On or before <u>April 30, 2018</u>	
The school failed to provide evidence that it is meeting the standard established in any of the opportunities tests.	The school's 2017-18 annual Title IX report is to show evidence that the standard established in <u>at least one</u> of the three tests for provision of opportunities is being met. The T-63 form (Student Athletic Interest Survey summary) is to be complete and correct in that report.	On or before <u>April 30, 2018</u>	
The school failed to provide any minutes for Gender Equity Review Committee meetings held during the last three school years.	The school is to submit to KHSAA minutes for <u>at least three</u> GERC meetings held during 2017-18. These minutes are to be signed by all members in attendance and the school principal.	On or before <u>April 30, 2018</u>	

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
No deficiencies were designated as a result of the September 15, 2011 Title IX school visit.	None	None

OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
(Locker Rooms, Practice, and Competitive Facilities)	On or before <u>January 26, 2018</u>
The school is to submit to KHSAA a written listing of the locker room space assigned to each school team. <u>A copy of this listing is to become a permanent part of the Title IX file</u> .	
The school is to submit to KHSAA a written listing of the athletic equipment storage space assigned to each school team. A copy of this listing is to become a permanent part of the Title IX file.	On or before <u>January 26, 2018</u>
(Publicity) The school is to submit to KHSAA an explanation of the listed expenditure of \$1,230 for awards for the volleyball team on the T-35 form in the 2016-17 annual Title IX report. <u>If it is determined that this listed</u> <u>expenditure was in error, the actual amount of the expenditure should be submitted in order for an accurate evaluation can be completed</u> .	On or before <u>January 26, 2018</u>

PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING	
Name	Title
Keller Mackey	Student Athlete
Lydia Cyrus	Student Athlete
Kristi McCartney	Girls Basketball Coach
Rick Folden	Athletic Director
Jason A. Mackey	Principal
Gary W. Lawson	KHSAA

OTHER GENERAL OBSERVATIONS

No one from the community attended the Public Comments session. It is documented here that school officials stated they <u>did not</u> advertise the time or location of the Public Comments session as requested by KHSAA. The meeting was adjourned at 3:25 pm EDT.