



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

KHSAA Form T76
Rev..11/16

School:	Raceland
Prepared By:	Gary W. Lawson
Date of Re-Visit:	February 11, 2020
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2019-2020

ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:

OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT)	Deficient
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	X

ACCOMMODATIONS OF INTEREST AND ABILITIES: The January 29, 2008 and the December 12, 2013 Title IX school visit reports rated the accommodations of interest and abilities *Satisfactory* based on evidence indicating that the standard established by Test 3 for the provision of athletic opportunities was being met at the time of both visits. A review of the annual reports for the past two years indicate that the school is not currently meeting the standard established by any of the three opportunities tests. In regard to Test 1, the 2018-19 annual Title IX report shows that females—the underrepresented gender—were 36.3% of the participants while they were 50% of the school’s enrollment. In relation to Test 2, the addition of a varsity dance team increased the percentage of total participation for females by nine percent. In regard to Test 3, the most recent student athletic interest survey (2017-18) shows an indicated interest in soccer (43), swimming (19), and bass fishing (23). The T-3 form in the 2017-18 states that meetings will be held to assess the interest in bass fishing and soccer, but neither the T-3 form or the T-60 form in the 2018-19 annual Title IX report indicate any follow-up has taken place. Since it cannot be verified that these interests have been addressed for validity, this area is designated **deficient**. School officials were reminded that failure to present evidence of the provision of equitable opportunities is the most significant deficiency within the Title IX evaluation. **(See KHSAA Recommended Action.)** The T-63 form in the 2017-18 annual Title IX report shows that a 90.3% completion rate was received on the most recent student athletic interest survey. IT IS TO BE NOTED THAT THE SCHOOL FAILED TO PROVIDE ANY EVIDENCE OF AN ACTIVE GENDER EQUITY REVIEW COMMITTEE. NO MINUTES FOR ANY MEETINGS HELD DURING THE PAST THREE YEARS WERE MADE AVAILABLE AT THE TIME OF THE MOST RECENT VISIT. INFORMATION FROM SCHOOL ADMINISTRATORS INDICATED THAT NO GEREC MEETINGS HAVE BEEN HELD FOR “AT LEAST” THREE TO FOUR YEARS. **(See KHSAA Recommended Action.)** During the 2/11/20 visit, the school’s Title IX file was reviewed. It contained copies of annual Title IX reports for the past three years, a board-approved extra service pay schedule for coaches, a listing of individuals identified as members of a Gender Equity Review Committee, usage schedules for one of the three weight training rooms, and a listing of when the girls basketball team used the gym **(see Scheduling of Games and Practice Times and KHSAA Recommended Action)**, guidelines addressing the posting of athletic banners and induction into the school’s athletic hall of fame **(see Publicity and KHSAA Recommended Action)**, written designation of the locker room and athletic equipment storage space assigned several of the school’s teams, **(see Locker Rooms, Practice and Competitive Facilities and KHSAA Recommended Action)**, a chart showing partial cycles for team uniform replacement **(see Equipment and Supplies and KHSAA Recommended Action)**, and some written guidelines addressing the mode of transportation and provision of meals for student athletes **(see Travel and Per Diem Allowances and KHSAA Recommended Action)**. SCHOOL OFFICIALS WERE STRONGLY ENCOURAGED TO ESTABLISH A GENDER EQUITY REVIEW COMMITTEE AND BEGIN THE PROCESS OF DEVELOPMENT OF GUIDELINES ADDRESSING PROVISION OF EQUITABLE 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 2008 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. The most recent visit revealed that the school had a uniform review, rotation, and/or replacement plan that contains either inaccurate or incomplete cycles of replacement for teams. **(See KHSAA Recommended Action.)** The uniforms and equipment examined during this visit showed two significant disparities. (1) One boys team—football—is supplied shoes as part of the uniform. No girls team is provided this amenity. (2) The uniforms displayed by the school’s Title IX coordinator revealed a disparity in the quantity of softball uniforms when compared to baseball. According to the Title IX coordinator, softball is supplied one game top only per player, and baseball is given three full uniforms per player. It should be noted that an interview with a softball player indicated that the softball uniform seen during this visit was not all that was provided for team members. **(See KHSAA Recommended Action.)** The failure of the school to show equivalence in the uniforms provided, and the failure to offer evidence that an equitable plan of replacement is being followed renders this benefit category to be **deficient**. **(See KHSAA Recommended Action.)** The 2017-18 and 2018-19 annual Title IX reports show that the school was spending approximately \$168 per female athlete and \$219 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 2008 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. A major component of this benefit category is the equitable scheduling of competitive events for teams of “like” sports. This area could not be evaluated due to the failure of the school to provide recent game schedules for all varsity teams as requested for this visit. The school Title IX coordinator was given the opportunity to present this information during this recent visit, but he did not. **(See KHSAA Recommended Action.)** According to information gathered during this visit, the practice facilities that are shared per gender at the school are two weight training rooms and the main gym. A complete usage schedule for the gym shared by both boys’ and girls’ basketball was not available, and an equitable usage schedule was provided for only one weight training room. The failure to produce evidence of equitable scheduling of competitive events and the sharing of practice facilities renders this benefit category to be **deficient**. **(See KHSAA Recommended Action.)** The scheduling of competitive events during the most optimal playing times on an equitable basis was discussed with school officials who were encouraged to monitor this endeavor closely.

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 2008 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. According to information gathered during the most recent visit, a board-owned school bus is the only mode of transportation ever used by student athletes. Vans or charter buses are not used for students. The Title IX file had some statements related to the equitable provision of meals. UPON RECEIPT OF THIS REPORT, THE GUIDELINE ADDRESSING MEAL ALLOTMENTS SHOULD BE MADE MORE SPECIFIC. (i.e. Is \$15 allotment per day, per meal, or for entire trip?) There were no regulations available during this visit in regard to the equitable provision of lodging. (**See KHSAA Recommended Action.**) Interviews with student athletes indicated that no consistent regulations were being followed in terms of lodging. The 2017-18 and 2018-19 annual Title IX reports showed the school was spending approximately \$182 per female athlete and \$136 per male athlete for equipment and supplies.

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

BENEFITS REVIEW- COACHING: The 2008 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. During the most recent visit, it was learned that the principal is responsible for the evaluation of all head coaches. A written instrument is not currently used for documentation of this process. The extra service pay schedule seen during the visit appears to show equivalence. 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 showed relative parity. Information gathered during this visit indicated that the coaching ratio for females is 7.6 participants per coach and for males is 9.6 participants per coach. The school's Title IX coordinator shared data showing that 14% (1/7) of the head coaches of girl's teams and 57% (4/7) of the head coaches of boy's teams are on-campus employees. According to this data, the coaching ratio appears to favor female participants, and the availability of on-campus coaches favors male participants.

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 2008 Title IX school visit report designated this benefit category *Deficient* because of long existing disparities in the amenities at the softball field compared to those at other outdoor venues. The 2013 report designated this category *Satisfactory* stating that the disparities at the softball field had been addressed by the addition of a press box, construction of a brick wall at the base of the backstop, installation of fence netting, enclosure of the bullpens, cutting the infield, and correcting drainage issues. The tour of competitive facilities during the most recent visit revealed that the venues for “like” sports had equitable amenities. The Title IX file did not list a dressing area for boys and girls golf. UPON RECEIPT OF THIS REPORT, THE LISTING FOR DRESSING AREAS IS TO BE AMENDED TO INDICATE THAT GOLFERS HAVE THIS BENEFIT AT THE GOLF COURSE. A tour of the dressing areas showed a significant disparity in the quality of locker rooms for athletes, but these differences were gender neutral. The tour also revealed that teams had several equipment storage areas that were not listed in the file. UPON RECEIPT OF THIS REPORT, SCHOOL OFFICIALS ARE ASKED TO UPDATE THE LISTING OF EQUIPMENT STORAGE AREAS TO SHOW ALL STORAGE SPACES USED FOR SCHOOL TEAMS. It appears that equity is being provided within this benefit category, but documentation is needed.

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 2008 Title IX school visit report designated this benefit category *Satisfactory*. The 2013 report designated this category *Deficient*. The major cause of the deficiency was the school’s lack of a usage schedule for one weight training room seen during the tour of facilities, and the interviews with coaches and student athletes that revealed the existence of two additional weight training facilities to which KHSAA representatives were not given access. The tour during the most recent school visit showed that the school currently has three weight training facilities. Weight room #1 is a large, well-equipped venue located in the “old gym.” It has numerous training options that are very suitable for female athletes. An equitable usage schedule for this room was in the Title IX file and posted at the facility. Weight room #2 is in the “old high school” and is used only by the football team and had equipment more suitable for male athletes. Weight room #3 is a very small venue located in the new gym. It has fewer training options than the other two facilities, but does have equipment that appears appropriate for use by females. There was no usage schedule available for this facility. (**See *Scheduling of Games and Practice Times and KHSAA Recommended Action.***) Interviews with student athletes confirmed fairly widespread use of and equitable access to weight training rooms 1 and 3. Daily access to an athletic trainer is available on an equitable basis through a contract with Kings Daughters Sports

Medicine. Free athletic examinations are available on the first Friday in May by doctors and nurses from Kings Daughters Sports Medicine.

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 2008 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. The 2013 report stated that the regulations addressing equitable provision of awards, as well as the guidelines related to the posting of banners, needed to be expanded and updated. The school currently has one varsity cheerleading squad that cheers at all home and away football games. There was no written policy and school administrators did not know how the cheerleaders were assigned for girls and boys basketball games. (**See KHSAA Recommended Action.**) The band performs at all home football games, and the pep band plays at an equal number of boys and girls home basketball games. The number of games that the pep band gives support is monitored and approved by the principal for the provision of parity. The Title IX file had equitable guidelines concerning the posting of banners for athletic recognition, and the tour of facilities confirmed that these guidelines were being followed. The file also contained criteria for induction into the school's athletic hall of fame. The school did not provide the requested regulations addressing equivalence for student athletes in terms of awards and post season banquets. (**See KHSAA Recommended Action.**) Interviews with student athletes seemed to confirm the provision of parity in regard to awards, but there was insufficient confirmation related to banquets. The 2017-18 and 2018-19 annual Title IX reports show that the school was spending approximately \$52 per female athlete and \$39 per male 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 2008 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. The tour of facilities during the most recent visit revealed that exclusive coaching offices are provided for football, boys basketball, and girls basketball. The school currently has one booster club that supports the football team. This booster club houses all its funds outside of school accounts, and, according to administrators, there are no procedures in place for oversight or approval of booster spending in regard to the provision of equitable benefits. IT WAS EMPHASIZED TO SCHOOL OFFICIALS THAT THERE NEEDS TO BE A MECHANISM IN PLACE FOR THE OVERSIGHT OF BOOSTER SPENDING. An analysis of athletic spending for the past two years is as follows:

2017-18 - Thirty-eight (38) percent of spending was for female athletes (the underrepresented gender) who made up 36% of the participants. Sixty-three (63) percent of the spending was for male athletes who made up 64% of the participants. This means that \$816 was spent per athlete for females and \$760 per athlete for males.

2018-19 - Thirty-nine (39) percent of spending was for females who were 36% of the participants. Sixty-one (61) percent was spent for male athletes who were 64% of the participants. This means that \$993 was spent per female athlete and \$878 was spent per male athlete for total support.

If these expenditures submitted by the school are averaged over the two-year period of this analysis, they appear to show an advantage to female participants.

CURRENT DEFICIENCIES		
Observed Deficiencies in Overall Girls and Boys Programs	Recommended Actions in Relation to Current Deficiencies	Date for Verification of Action to Address Deficiency
<p>(Accommodation of Interest and Abilities)</p> <p>The school failed to provide evidence that it was meeting the standard of any one of the Title IX opportunities tests.</p>	<p>(1) The school is to submit to KHSAA a sign-in sheet for at least one meeting held after school hours to assess the interest in boys' soccer and girls' soccer and swimming. If valid interest is confirmed by this meeting, a written description of the next steps to be taken to address these interests are to be included.</p> <p>(2) If any indicated athletic interests are shown as a result of the 2019-20 athletic interest survey, the steps taken to</p>	<p>On or before <u>October 9, 2020</u></p>

	<p>address these interests are to be included on the <u>T-3 and T-63 form in the 2019-20 annual Title IX report.</u></p> <p>The school is to submit to KHSAA minutes for Gender Equity Review Committee meetings held on or before <u>October 9, 2020, December 31, 2020, and April 15, 2021.</u> Minutes for each meeting are to be signed by all GERC members in attendance and by the principal.</p>	<p>On or before <u>October 9, 2020</u></p> <p>On or before <u>December 31, 2020</u></p> <p>On or before <u>April 15, 2021</u></p>
<p>(Equipment and Supplies)</p> <p>The school failed to provide an equitable uniform review, rotation, and/or replacement plan.</p> <p>The school failed to show the provision of equivalence in regard to uniforms and uniform extras.</p>	<p>The school is to submit to KHSAA a uniform review, rotation, and/or replacement plan showing a full and equitable cycle of replacement for all school teams. This plan is to be signed by all head coaches, all members of the GERC, and the principal.</p> <p>(1) The school is to submit a written explanation of how it is addressing the current disparity in regard to shoes given to student athletes.</p> <p>(2) The school is to submit a photograph and written description of the complete uniforms provided this school year for the softball and baseball teams.</p>	<p>On or before <u>August 1, 2020</u></p> <p>On or before <u>August 1, 2020</u></p> <p>On or before <u>August 1, 2020</u></p>
<p>(Scheduling of Games and Practice Times)</p> <p>The school failed to provide evidence showing that competitive events were being scheduled and played on an equitable basis.</p> <p>The school failed to provide evidence of equitable use of practice venues that are shared by gender.</p>	<p>The school is to submit a written list showing the number of competitive events scheduled (played) by all varsity teams during the 2019-20 school year. <u>This list does not include post season.</u></p> <p>The school is to submit usage schedules showing equitable female access for the gym and weight training room #3. (See <i>Medical and Training Facilities and Services.</i>)</p>	<p>On or before <u>August 1, 2020</u></p> <p>On or before <u>August 1, 2020</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>(Medical and Training Facilities and Services)</p> <p>The deficiency in this benefit category designated in the December 12, 2013 Title IX school visit report appears to have been, at least, partially addressed by the provision of equitable access to weight training room #1 in the "old gym." A second shared weight room (#3) also has equipment suitable for females.</p>	<p>See <i>Medical and Training Facilities and Services and KHSAA Recommended Action.</i></p>	

OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
<p>(Publicity) The school is to submit to KHSAA a written description of the process used to assign the cheerleading squad to support boys and girls basketball. The person/position responsible for monitoring this process for equivalence is to be included in the submittal. This documentation is to be signed by all members of the GERC and the principal.</p> <p>The school is to submit to KHSAA written regulations addressing the provision of parity in regard to athletic awards and post season banquets/ recognition ceremonies. Once approved, these regulations are to become part of the Title IX file.</p>	<p>On or before <u>August 1, 2020</u></p> <p>On or before <u>August 1, 2020</u></p>
<p>(Travel and Per Diem Allowances) The school is to submit to KHSAA written regulations addressing equitable provision of lodging for student athletes. These regulations are to be signed by all members of the GERC and, after approval, a copy should be placed in the Title IX file.</p>	<p>On or before <u>August 1, 2020</u></p>
<p>The school is to form a Gender Equity Review Committee and submit to the KHSAA the names of the people on this committee and their role in the school (coach, student, administrator, etc.). The school should also submit a meeting schedule of dates for the 2020-2021 school year.</p>	<p>On or before <u>October 1, 2020</u></p>
<p>(KRS 160.445) The school is to submit to KHSAA an <i>Athletic Facility Emergency Medical Plan</i> that is venue-specific as required by the statute.</p>	<p>On or before <u>August 1, 2020</u></p>

PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING

Name	Title
Gary W. Lawson	KHSAA
Chloe Collins	Student Athlete
Kirk Pence	Student Athlete
David M. Francis	Boys and Girls Tennis Coach
Kim Sexton	Girls Golf
Bill Farley	School Title IX Coordinator
Tom Collins	Principal

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 Plan (KRS 160.445). The plan made available during this visit was not venue-specific as requested by the statute. **(See OTHER ACTIONS NECESSITATED BY THIS VISIT.)**

As per request, the school was asked to identify the locations of its Automated External Defibrillators. According to the school's Title IX coordinator, there are permanent AED's in the (1) commons area adjacent to the high school gym, (2) lobby of the "old high school", (3) concession stand at the football/softball complex, (4) concession stand at the baseball field, and (5) concession stand adjacent to the practice football field and tennis courts.

No one from the community attended the Public Comments session. SCHOOL ADMINISTRATORS WERE STRONGLY ENCOURAGED TO FORM A GENDER EQUITY REVIEW COMMITTEE AND DELIBERATELY MONITOR THE EQUITABLE PROVISION OF OPPORTUNITIES AND BENEFITS FOR THEIR STUDENT ATHLETES. The meeting was adjourned at 3:25pm EST.