



**KHSAA TITLE IX RE-VISIT
FINAL AUDIT REPORT**

(For schools re-visited during the 2013-2014 school year)

School: Valley
Prepared By: Gary W. Lawson
Date of Re-Visit: January 9, 2014
Telephone Number of Reviewer: **(859) 299-5472**
Reviewed By: **Darren Bilberry, Asst. Commissioner**

1. Completed Required Forms

- Verification of Forms (Form GE-19) Yes No
- Participation Opportunities Summary Chart (Form T-1, T-2, T-3 & T-4) Yes No
- Benefits Summary Charts (Forms T-35 & T-36) Yes No
- Checklist Overall Athletics Program (Form T-41) Yes No
- Title IX Improvement Plan Summary Charts (Form T-60) Yes No

2. Opportunities Component of Title IX Compliance

Area of Compliance:
(Check One or More)

X	A	Substantial Proportionality
	B	History and Continuing Practice Of Programs Expansion
X	C	Full and Effective Accommodation of Interest and Abilities

- A). Was the Substantial Proportionality Test (T-1) an area in which the school met Title IX Opportunities compliance?
Yes No

Comments: The rosters and data submitted indicate the school is currently meeting the standard established in Test 1 for provision of athletic opportunities. The rosters provided in the 2012-13 annual Title IX report shows that the percentage of participation (46.5%) is within three percent of the percentage of enrollment (48.4%) for females.

- B). Was the History and Continuing Practice of Program Expansion Test (T-2) an area in which the school met Title IX Opportunities compliance?
Yes No

Comments: The rosters and data submitted indicate that the standard established in Test 2 for provision of athletic opportunities has not been met during any of the past three school years. The T-2 form in the 2012-13 annual report is incorrect. Therefore, the percentage of participants added in the last five years cannot be accurately determined. (See *Accommodation of Interests and Abilities.*)

- C). Was the Full and Effective Accommodations of Interest and Abilities Test (T-3) an area in which the school met Title IX Opportunities compliance?
Yes No

Comments: The responses on the T-3 form indicate that the standard established in Test 3 for provision of athletic opportunities is currently being met. These responses appear to be supported by the information found in the most recent student athletic interest survey.

3. Is the school's most recent Student Interest Survey accurate in relation to the assessment of Interests & Abilities?
Yes No

Comments: The T-63 form submitted as part of the 2011-12 annual Title IX report shows that a 95% completion rate was received on the most recent student athletic interest survey.

4. Checklist of the Title IX Components of the Interscholastic Program

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>The January 31, 2002 school visit report deemed this area <i>Satisfactory</i> based on the documentation indicating the school was meeting the standard established in Test 2 for provision of athletic opportunities. The November 17, 2005 report also rated this area <i>Satisfactory</i> stating that, at that time, the school seemed to be meeting the standard established in Test 1. Information submitted in the annual reports for the past three years give indication that the school is meeting the standards established in both Tests 1 and 3. The female participation rate is within three percent of the female enrollment. In order to continue to meet the standard established in Test 3, the indicated interest in archery and bass fishing should be closely monitored. The T-2 form in the 2012-13 annual report is incorrect because it shows that all sports currently sponsored by the school have been added during the past five years. <u>This form should be corrected and an accurate document submitted in the April 30, 2014 annual report.</u> It was also noted during the visit that the team rosters submitted in the 2012-13 annual report contained some obvious errors. School officials were alerted to the numerous ways the rosters affect the opportunities tests. During the most recent visit the Title IX file was reviewed. It contained all the annual Title IX reports submitted to KHSAA for the past five years, a board-approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, a school generated athletic handbook for students, a copy of a written booster club agreement, some limited guidelines relating to recognition of athletic accomplishments (see <i>Publicity and KHSAA Recommended Action</i>), minutes for GERC meetings held during the past three years, some statements relating to equitable provision of uniforms (see <i>Equipment and Supplies and KHSAA Recommended Action</i>), and a copy of the school's athletic facility emergency medical plan (KRS 160.445). School officials were strongly encouraged to</p>

Accommodation of Interests and Abilities continued			work with the Gender Equity Review Committee to develop an organized and comprehensive Title IX file.
Equipment and Supplies		X	Both the 2002 and the 2005 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . At the time of <u>both</u> visits, the <u>school had no uniform review, rotation, and/or replacement plan in place.</u> Development of an equitable plan was <u>requested in both reports.</u> The Title IX file currently contains some written statements pertaining to uniform purchases, but it appeared that there is still <u>no uniform review plan in place.</u> Because there have been two previous attempts to encourage development of this document to help insure parity with no positive results, this category is deemed <i>Deficient</i> . (See <i>KHSAA Recommended Action</i> .) All the uniforms seen during the visit appeared to be of mid-to-high quality and were provided in equitable quantities. According to information submitted in the 2011-12 and 2012-13 annual reports, the school was spending approximately \$47 per female athlete and \$44 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		The previous two school visit reports rated this benefit category <i>Satisfactory</i> . Information provided during the most recent visit showed that the number of competitive events scheduled for teams of "like" sports was equitable. There was no documentation provided that showed the shared practice facilities (gyms and batting cage) were assigned equitably. (See <i>KHSAA Recommended Action</i> .) The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the provision of parity regarding this benefit.
Travel and Per Diem Allowances	X		The January 31, 2002 school visit report rendered this benefit category <i>Satisfactory</i> . The November 17, 2005 report rated this category <i>Deficient</i> citing the expenditures submitted for this area were incorrect making a complete evaluation impossible. Information

Travel and Per Diem Allowances continued			provided in recent annual reports show that some progress has been made in reporting accurate expenditures in this category. It does appear that some expenditures are still not being included in the total. Based on the information submitted in the 2011-12 and 2012-13 annual Title IX reports, the school was spending approximately \$39 per female athlete and \$33 per male athlete for travel and per diem. The Title IX file contained written guidelines for the provision of meals for student athletes. These guidelines did not address equitable provision in relation to the mode of transportation or lodging. (See <i>KHSAA Recommended Action</i> .)
Coaching	X		Both the previous Title IX school visit reports appraised this benefit category <i>Satisfactory</i> . The school's athletic director is currently responsible for evaluating all head coaches. A written instrument is used as part of this process. According to information in the 2012-13 annual Title IX report, the total amounts paid for salaries of coaches of teams of "like" sports appeared comparable. A review of the district's extra service pay schedule for coaches showed parity. The ratio of number of players per coach appeared to favor male athletes. Further investigation during the most recent visit showed this difference was a result of reporting errors on the T-35 form. Information gathered during the school visit showed that 20% of the head coaches of girls teams were off-campus employees while this was true for 19% of the head coaches of boys teams.
Locker Rooms, Practice and Competitive Facilities		X	Both the 2002 and the 2005 school visit reports judged this benefit category <i>Satisfactory</i> . <u>The 2005 report specifically requested that a written designation of all locker room space be developed and placed in the Title IX file.</u> During the most recent visit, it was impossible to adequately evaluate this benefit category because again, as in 2005, there was no written designation of the locker room and athletic equipment storage space assigned to each team. During the tour of facilities, there

<p>Locker Rooms, Practice and Competitive Facilities continued</p>			<p>was confusion about <u>where students actually dressed and where athletic equipment was, in reality, stored</u>. These issues—a <u>lack of written documentation of locker room and storage space assigned and the lack of clear evidence of where athletes dress and equipment is stored</u>—resulted in this category currently being rated <i>Deficient</i>. The school appears to have six available locker rooms. However, it seems that, at the most, only three are used for student athletes. (See <i>KHSAA Recommended Action</i>.) As far as amenities are concerned, the game and practice venues observed during the visit showed parity.</p>
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Medical and Training Facilities and Services	X		<p>The 2002 school visit report rated this benefit category <i>Satisfactory</i>, but did request that an equitable usage schedule for the weight training room be developed and posted at the facility. The 2005 report rated <u>this area <i>Deficient</i></u> stating there was no usage schedule for the weight training room and that <u>information gathered during the visit indicated the facility was primarily used by males.</u> The most recent visit showed that a new state of the art weight training room has been constructed as part of the new athletic arena. This facility contains a significant amount of equipment that is suitable for female use. There was a usage schedule posted at the facility which showed equitable access. A copy of this schedule should also become a part of the Title IX file. An athletic trainer is provided to student athletes on an equitable basis through a contract with K.O.R.T. Athletic physical examinations are provided to students free of charge on a designated day each spring. School funds are used to pay for these physicals.</p>
Publicity	X		<p>Both the earlier Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The school currently has one cheer squad that provides support for student athletes. This squad is assigned to cheer at home and away football games and home and away boys and girls basketball games. The pep band performs at all home football games and home boys and girls basketball games. The dance team performs at all home football games and at an equivalent number of home boys and girls basketball games as monitored by the athletic director. The Title IX file contains equitable written guidelines for posting banners in the gym and the provision of athletic awards. There are other examples of publicity that are not addressed in these guidelines. (See <i>KHSAA Recommended Action</i>.) According to the information provided in the 2011-12 and 2012-13 annual Title IX reports, the school was spending approximately \$9 per female athlete and \$8 per male athlete for awards.</p>

Support Services	X		The 2002 and 2005 Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The school currently has one athletic booster club that provides support for all school sponsored teams. This club houses its funds outside of school accounts, but there is a process in place for school administrators to approve all booster purchases in writing. An evaluation of athletic expenditures submitted on the T-35 forms for the past two years shows that per athlete spending has been within generally accepted parameters for the provision of parity in both school years 2011-12 and 2012-13.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		

5. Brief Summary/Analysis of the Title IX Improvement Plan (Form T-60)

The school's T-60 form for the past three years have not been submitted appropriately. Training in the completion of T-60 forms is apparently needed. (See *Observed Deficiencies in Overall Program*.)

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The most recent visit revealed some confusion and disorganization in relation the KHSAA requirements in relation to Title IX. Because of the inaccuracy of rosters submitted and the lack of development of an improvement plan to address current challenges, it is recommended that a representative of Valley High School attend one of the Title IX workshops offered by KHSAA during the 2014-15 school year and forward a copy of the certificate of attendance to the KHSAA office. There are two major deficiencies designated as a result of the January 9, 2014 school visit. These deficiencies are in the benefit categories of *Equipment and Supplies* and *Locker Rooms, Practice, and Competitive Facilities*. There are also "areas of concern" listed in the benefit categories of *Travel and Per Diem, Scheduling of Games and Practice Times,* and *Publicity*. Please refer to *KHSAA Recommended Action* in relation to all the all the above mentioned categories.

7. KHSAA Recommended Action in relation to new deficiencies

(Equipment and Supplies)

On or before **April 14, 2014**, the school is to submit to KHSAA a completed uniform review, rotation, and/or replacement plan that shows a full cycle of replacement of all school sponsored sports. It is required that this plan be submitted as a chart showing the specific years of review for each sport. This plan is to be accompanied by a signature sheet which is signed by the athletic director, principal, head coaches of all the athletic teams, and the members of the Gender Equity Review Committee. Documentation of the implementation of this plan is to also be a part of the school's April 30, 2014 Title IX improvement plan (T-60 form). This plan is also to become a part of the school's Title IX file.

(Locker Rooms, Practice and Competitive Facilities)

On or before **April 14, 2014**, the school is to submit to KHSAA a written listing of the locker room space assigned to each team sponsored at Valley High School. This listing should provide evidence that all available locker room space is assigned to teams in an equitable manner. This document is to be signed by the principal, athletic director, all head coaches of school sponsored teams, and all members of the Gender Equity Review Committee. Documentation of the provision of these locker rooms is to be a part of the school's April 30, 2014 Title IX improvement plan (T-60 form). This plan should also become a part of the Title IX file.

On or before **April 14, 2014**, the school is to submit to KHSAA a written listing of the equipment storage space assigned to each school sponsored team at Valley High School. This listing should offer evidence that available space is provided for all teams in an equitable manner. This document is to be signed by the principal, athletic director, all head coaches of school sponsored teams, and all members of the Gender Equity Review Committee. Documentation of the provision of athletic equipment storage space is to be a part of the school's April 30, 2014 Title IX school improvement plan (T-60 form). This document is also to become a part of the Title IX file at the school.

Although not currently designated as deficient, the following "areas of concern" should be addressed in an attempt to insure equity in the provision of benefits.

(Scheduling of Games and Practice Times)

On or before **April 14, 2014**, the school is to submit to KHSAA written usage schedules for the gyms at the school. This schedule should show provision of equitable access to these facilities. Copies of these schedules are to become part of the Title IX file.

On or before **April 14, 2014**, the school is to submit to KHSAA a written usage schedule for the outdoor hitting facility which is shared by the baseball and softball teams. This schedule is to be signed by the head softball coach and head baseball coach and is to become part of the Title IX file.

(Travel and Per Diem Allowances)

On or before **April 14, 2014**, the school is to submit to KHSAA an expansion of the current written guidelines for travel and per diem that addresses the equitable provision of the mode of transportation and lodging for student athletes. The completed document should become a part of the Title IX file.

(Publicity)

On or before **April 14, 2014**, the school is to submit to KHSAA an expansion of the current guidelines for athletic recognition which includes provision of athletic banquets and requirements for becoming a member of the school's Athletic Hall of Fame. This completed document is to become a part of the Title IX file.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

- The deficiency designated in *Travel and Per Diem Allowances* identified in the November 17, 2005 school visit report appears to have been addressed by the progress that has been made in relation to submittal of expenditures within this benefit category.
- The deficiency designated in *Medical and Training Services and Facilities* identified in the November 17, 2005 school visit report appears to have been addressed by the construction of a new weight training facility which contains a significant amount of female-friendly equipment. There is also documentation that equitable female access is provided to this facility.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: William Raleigh, 10200 Dixie Hwy., Louisville, KY 40272
(502) 485-8621

District Level Title IX Coordinator: Cheryl Walker, 3332 Newberg Rd., Louisville, KY 40232
(502) 485-3341

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Brianna Trigo	Student Athlete	(502) 485-8339
Chanze Castro	Student Athlete	(502) 485-8339
Otis Ralston	Cross Country Coach	(502) 485-8339
Michael Crowe	Girls Basketball Coach	(502) 485-8339
William S. Raleigh	Athletic Director	(502) 485-8621
Robert L. Stephenson	Principal	(502) 485-8339
Barbara Kok	KHSAA	(859) 299-5472

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:10 pm EST.