



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

KHSAA Form T76  
Rev..11/16

School:	Valley
Prepared By:	Gary W. Lawson
Date of Re-Visit:	February 14, 2023
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2022-23

**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>N A Covid 19</b>	
<b>Analysis Form Review</b>	<b>X</b>

**ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES:** Both the November 17, 2005 and the January 9, 2014 Title IX school visit reports rated the accommodation of student interest and abilities SATISFACTORY. Information presented by the school showed that the standard established by Test 1 for provision of athletic opportunities was being met at that time. In 2014, the data indicated that the standards established by both Tests 1 and 3 were being met. At that time, the percentage of participation (46.5%) was within three percent of enrollment (48.4%) for females [Test 1]. It also appeared that student athletic interests were being accommodated based on the results of the most recent student athletic interest survey [Test 3]. A review of the annual Title IX reports for the past two years gives significant indication that the school is **not** currently meeting the standard of any of the three opportunities tests. In regard to Test 1, the percentage of participation is 17% below their percentage of enrollment for females. The 2021-22 annual report shows that no participation opportunities, at any level, have been added for females in the past five years (Test 2). According to the internal analysis form compiled by KHSAA, Test 3 could not be evaluated due to complications from covid 19. The school received only a 61% completion rate on its most recent student athletic interest survey. Because of the pandemic, the school is not rendered to be deficient in this area at the present time. (See **KHSAA Recommended Action**). During the most recent school visit, the Title IX file was reviewed. It was found to contain a board-approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, recent game schedules for all varsity teams, a facility usage schedule for the weight training room, regulations regarding the equitable provision of awards and recognition of athletic accomplishments, designation of the locker room and athletic equipment storage space assigned each team, minutes for two Gender Equity Review Committee meetings held in 2019-20, for one meeting in 2020-21, and for one meeting in 2022-23. (See **KHSAA Recommended Action**). The file also contained a uniform review, rotation, and/or replacement plan, and guidelines relating to equitable provision of travel and per diem. The school's athletic director was commended for the progress he has made in the development of a comprehensive 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 2005 Title IX school visit report rated this benefit category *SATISFACTORY*. The report documented that the school did not have a uniform review, rotation, and/or replacement plan as recommended by the January 31, 2002 Title IX report. The 2014 Title IX report rated this benefit category *DEFICIENT* stating that the school still had no equitable uniform rotation plan in place. All the uniforms viewed during the most recent visit were of mid-to-high quality and seem to be supplied in equitable quantities except in the case of softball (five uniform tops and two pants) while baseball had two tops and two pants. A newly developed uniform review, rotation, and/or replacement plan showing all teams on a three-year cycle of replacement was presented during this visit. Interviews with student athletes indicated equitable cycles of replacement for “like” sports. The 2020-21 and 2021-22 annual Title IX reports show the school was spending \$117 per male athlete and \$185 per female athlete for equipment and supplies. The data submitted in the 2021-22 annual Title IX report for this benefit category appears to be inaccurate with budgeted amounts shown rather than actual expenditures. (See *Support Services* and *KHSAA Recommended Action*.)

BENEFIT	Satisfactory	Deficient
2014	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 2005 and 2014 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2014 report stated that “no documentation provided” for the equitable sharing of practice facilities—the gym and batting cage. Information gathered during the most recent visit showed that the batting cage is no longer shared since both baseball and softball have a cage. According to the athletic director, both the boys and girls basketball teams currently practice at the same time in the main arena gym. A large curtain is lowered to split the gym into two full courts allowing this unique practice situation. An equitable usage schedule was available for the weight training room which is the only shared per gender venue. Information gathered during the visit indicated that the number of competitive events scheduled for teams of “like” sports was comparable. The scheduling of athletic events during optimal playing times on an equitable basis for both genders was discussed with school officials who were encouraged to make this type of scheduling a priority.

<b>BENEFIT</b>	<b>Satisfactory</b>	<b>Deficient</b>
TRAVEL AND PER DIEM	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:** The 2005 Title IX school visit report rated this benefit category *DEFICIENT* because inaccurate information was submitted in regard to this area on the T-71 form- expenditures. It was also noted in the report that the school had no regulations addressing equitable provision of travel and per diem. The 2014 Title IX school visit report rated this category *SATISFACTORY* documenting that progress had been made in the submittal of accurate expenditures. The report also stated that some regulations for parity were in place, but the equitable provision of the mode of transportation and student lodging still needed to be addressed. During the most recent visit, regulations in the Title IX file showed the school had addressed the provision of parity regarding mode of transportation and meals and lodging for student athletes. The guidelines that the school is currently using for lodging needs to be reevaluated and updated by the Gender Equity Review Committee. These guidelines need more realistic parameters for current student athletes. The 2020-21 and the 2021-22 annual Title IX reports show that the school was spending \$100 per male athlete and \$105 per female athlete for travel and per diem. The data submitted in this category in the 2021-2022 annual report appears to be inaccurate. There were **zero (\$0)** expenditures listed for ten teams. Teams with listed expenditures appeared to be *budgeted* amounts. (See **Support Services and KHSAA Recommended Action.**)

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

**BENEFITS REVIEW- COACHING:** The 2005 and 2014 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 currently used for documentation of this process. A review of the district's extra service pay schedule showed parity in the amounts paid to coaches of "like" teams and the number of coaching positions compensated for "like" teams. A review of the T-35 form in the 2020-21 annual Title IX report shows that the total amounts spent for coaching salaries for teams of "like" sports were comparable. [The 2020-21 report was used for this analysis because of errors found in the 2021-22 report.] (See **Support Services and KHSAA Recommended Action.**) Data gathered during this visit indicated that the coaching ratio was 9.0 participants per coach for female athletes and also 9.0 participants per coach for male athletes. Additional data indicated that 57% (4/7) of the head coaches of girls teams and 67% (6/9) of the head coaches of boys teams were 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 2005 Title IX school visit report rated this benefit category *SATISFACTORY*. The report did state that the school had no written designation of the locker room space assigned each team. The 2014 report rated this category *DEFICIENT* stating there still was no written designation of the locker room space and that during the tour of facilities there was confusion about where students dressed and where athletic equipment was actually stored. The review of the Title IX file during the most recent visit showed a dressing area and equipment storage area assigned for each team. The tour of facilities during this visit confirmed the locations of these facilities. The main arena at the school houses four large dressing rooms with an adequate number of functional lockers. These dressing areas are shared by all school teams except wrestling, football, and baseball. These three teams have less well-maintained dressing areas closer to their competitive facilities. All the dressing rooms appear to be assigned equitably. There appears to be a definite need at the school for more equipment storage space, but the available space seems to be assigned equitably in terms of the size of the team and proximity to its practice and competitive facility. Several of the competitive venues, other than the main arena, are in need of maintenance and updating, but the facilities serving “like” sports appear to provide comparable amenities.

<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 2005 Title IX school visit report rated this benefit category *DEFICIENT* stating that the weight training room gave the impression of a facility used primarily by males. This situation was compounded by the school’s failure to have a posted weight training schedule for all sports as requested by the 2002 Title IX school visit report. Th 2014 Title IX school visit report rated this benefit area *SATISFACTORY* documenting that a new weight room had been constructed that had equipment suitable for female use and an equitable usage schedule was posted at this venue. The tour of facilities during the most recent visit revealed that the school has a spacious and adequately equipped weight training room in the main arena. There appeared to be numerous training options that are suitable for female athletes. Interviews with student athletes indicated that there is not widespread use of this venue by female athletes, but that equitable access is offered. A usage schedule showing equitable access was in the Title IX file and posted at the venue. An athletic trainer is available on an equitable daily basis through a contract with KORT. Free physical exams are provided by JCPS on three designated days each year.

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

**BENEFITS REVIEW- PUBLICITY:** The 2005 and 2014 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2014 report requested that the regulations for this area be expanded to include equitable provision of athletic banquets and the criteria for induction into the school's Athletic Hall of Fame. There is currently one varsity cheerleading squad that is assigned to cheer at all home football games and at all home boy/girl double header basketball games. The pep band performs at all home football games, but does not currently play at basketball games. The Title IX file had excellent regulations addressing parity in regard to the posting of recognition banners, awards, and post-season banquets as well as the criteria for induction into the Athletic Hall of Fame. The 2020-21 and 2021-22 annual Title IX report showed that the school was spending \$19 per male athlete and \$21 per female athlete for awards and athletic recognition.

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

**BENEFITS REVIEW- SUPPORT SERVICES:** The 2005 and 2014 Title IX school visit reports rated this benefit category *SATISFACTORY*. The tour of facilities during the most recent visit revealed that the available office space at the school was assigned equitably. According to administrators, the school has no booster clubs supporting the athletic teams at this time. The analysis of total athletic spending for 2020-21 shows that 39.02% of expenditures were for females who made up 38.69% of the participants or \$729.09 per female athlete. At the same time, 60.98% of the expenditures were for male athletes who made up 61.31% of the participants or \$714.13 per male athlete. These expenditures appear to be within generally accepted parameters for parity on both a percentage and per athlete basis at a football-playing school. **ATHLETIC SPENDING FOR 2021-22 COULD NOT BE ANALYZED DUE TO ERRORS ON THE T-35 FORM. (See *Coaching Salaries* column, *Travel and Per Diem* column, and *Equipment and Supplies* column in the 2021-22 annual Title IX report and *KHSAA Recommended Action*).** The inaccurate submittal of expenditures in these benefit categories makes it impossible to evaluate total support services over a two-year period, therefore, rendering this benefit category **DEFICIENT**.

**CURRENT DEFICIENCIES**

<b>Observed Deficiencies in Overall Girls and Boys Athletics Programs</b>	<b>Recommended Actions in relation to current deficiencies</b>	<b>Date for Verification of Action to address deficiency</b>
<p><b>(Support Services)</b> The school failed to submit accurate expenditures on the 2021-22 annual Title IX report in the benefit categories of <b>Equipment and Supplies, Travel and Per Diem Allowances, and salaries.</b> These inaccuracies made it impossible to evaluate total athletic support.</p>	<p>The school is to submit to KHSAA a T-35 form for the 2021-22 school year which has accurate expenditures in the <b>Equipment and Supplies</b> column, <b>Travel and Per Diem</b> column, <b>and the Coaching Salaries</b> column.</p>	<p>On or before <b><u>May 15, 2023</u></b></p>

**RECURRING DEFICIENCIES**

<b>Observed Deficiencies in Overall Girls and Boys Athletics Programs</b>	<b>Recommended Actions in relation to recurring deficiencies</b>	<b>Date for Verification of Action to address deficiency</b>
<p><b>(Equipment and Supplies)</b> The deficiency in this area assessed by the 2005 Title IX school visit report appears to have been addressed by the development of an equitable uniform review, rotation, and/or replacement plan.</p>		
<p><b>(Locker Rooms, Practice and Competitive Facilities)</b> The deficiency in this area assessed by the 2014 Title IX school visit report appears to have been addressed by the documented evidence (Title IX file and tour of facilities) of the assignment of dressing areas and equipment storage space for all teams confirmed during the 2/14/23 Title IX school visit.</p>		

**OTHER ACTIONS NECESSITATED BY THIS VISIT**

<b>Action</b>	<b>Due Date</b>
<p><b>(Accommodation of Interest and Abilities)</b></p> <p>The school is to submit to KHSAA a written plan including the steps to be taken to meet the standard of <u>at least one</u> of the three Title IX <b>opportunities tests.</b></p> <p>The school is to submit to KHSAA <b>minutes</b> for <u>at least three</u> Gender Equity Review Committee meetings held during the 2022-23 school year.</p>	<p>On or before <b><u>May 15, 2023</u></b></p> <p>On or before <b><u>May 15, 2023</u></b></p>

**PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING**

<b>Name</b>	<b>Title</b>
Gary W. Lawson	KHSAA
Peyton Capps	Student Athlete
Leah Stinson	Student Athlete
Clay Hardesty	Volleyball/Baseball Coach
Dennis L. Williams	Girls Basketball
James Lenz	Athletic Director
Jennie Currin	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 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 AED's are (1) outside the concession stand in the main arena and (2) in the front hallway of the school.

No one from the community attended the Public Comments session which was advertised on the "ALL CALL" system, and on the marquee. The athletic director was commended for his preparation for the school visit. The meeting was adjourned at 3:15 EST.