

KHSAA ADMINISTRATION OF TITLE IX

STEPS FOR COMPLIANCE

Title IX Coordinators

The Kentucky Board of Education requires that each school district designate two coordinators, a School District Title IX Coordinator and a High School Title IX Coordinator. These individuals are responsible for ensuring that schools meet the standards for Title IX compliance. In most Kentucky school districts, the District Title IX Coordinator holds a position at the central office. Communication is imperative between the District Title IX Coordinator and the School Title IX Coordinator to achieve success.

The District Title IX Coordinator's main responsibility is oversight and monitoring of each high school within their district so that the district complies with Title IX. The primary responsibility of the School Title IX Coordinator is to coordinate the activities at the school level that are designed to promote gender equity in athletics. These specific activities include:

- Establish a Gender Equity Review Committee
- Maintain a permanent Title IX file at the high school
- Complete the Title IX Annual Report
- Prepare reports for on-site visits by KHSAA representatives as necessary
- All other duties deemed necessary to ensure compliance
- Adhere to KDE Red Book Guidelines

Gender Equity Review Committee

A Gender Equity Review Committee (GERC) is an important part of the compliance picture. The number of committee members may be reflected by the size of the school; larger schools generally have a greater number of members. The Title IX Coordinator at the High School shall be a member of the committee. Also, the membership must include student(s). It is recommended that there be two students who are in different years of high school.

Suggestions for the composition of the GERC include:

- Title IX Coordinator
- Students
- School administrators
- Athletic director
- Coaches of girls' and boys' teams
- School board members
- School board attorney
- School bookkeeper
- Counselors
- Booster club members
- Media representatives and parents

The School Title IX Coordinator should educate persons new to the GERC by providing all Title IX related written materials and resources so that new members may clearly un-

derstand the duties they have agreed to perform. This Title IX Manual and the KHSAA web-site (www.khsaa.org) contain information that is very beneficial to new members. A membership list for each school year is to be maintained in the permanent Title IX file. Members may serve more than one year, but committee membership should be reviewed and rotated every 3 to 5 years.

A minimum of three required meetings shall be scheduled each year and others as needed.
Suggested Meeting Dates

- August – Fall Sports Review
- November – Winter Sports Review
- February – Spring Sports Review

A quorum of the committee members must be present and the meeting conducted in accordance with applicable state law and accepted rules of order. Written minutes should be kept of all meetings in the school's permanent Title IX file. It is suggested that a committee member serve as a facilitator so that meetings may be conducted in a timely fashion.

The GERC shall develop a Title IX Action Plan and time table for implementation of the Plan. The GERC shall monitor the Plan continuously and implement corrective action as necessary. The Action Plan should include a review of the current status of sports offerings for boys and girls and compare such areas as:

- Locker rooms, practice and competition facilities
- Coaching stipends
- Coaching assistance
- Sports budgets and expenditures
- Total expenses for each gender
- Booster organizations
- Equipment and supplies
- Travel practices and allowances
- Medical and training facilities
- Scheduling of games and practice times

The GERC shall identify specific needs for improvement in the athletics program, giving priority to items required for equitable treatment of girls and boys. A timetable shall be established for implementing improvements based on:

- A comparison of sports offerings for girls and boys
- Facility reviews and identification of needed improvements
- Equalization of programs recognizing female and male athletes
- Reviews of coaching staff and revisions needed as identified by a self-assessment

Sample Format and Agenda for a Gender Equity Review Committee
Agenda (Include Meeting Date and Time)

- A. Welcome and Introductions of Committee Members – (Provide Sign in Sheet) (Identify and elect a Title IX School Coordinator if needed)
- B. New Member Orientation (Review Purpose of Committee)
- C. Review and approval of minutes from last meeting in preceding year
- D. Review of Corrective Action Plan for prior school year
- E. Immediate Concerns for current school year
- F. Review of Fall Sports Rosters
- G. Student Interest Survey (Mandatory every other year)
- H. Review of Athletic Expenditures for prior school year

- I. Review of new Annual Report Forms
- J. Future Meeting Dates
- K. Miscellaneous
- L. Adjourn

Permanent Title IX File

The KHSAA requires that each school maintain a "Permanent Title IX File." This file should be kept in the office of the Principal. Schools should maintain a well organized file with information arranged for easy access, as this will make it much easier to assess progress in regard to Title IX compliance. The Permanent Title IX File should include the original self audit completed during the 1999-2000 school year. In the original audit, each coach of each sport completed detailed information in each benefit area. The results of this audit became the starting point for schools to identify problem areas needing improvement.

Each School's Permanent Title IX File must include the following items:

- All of the school's Annual Reports to the KHSAA
- Any correspondence with the KHSAA relating to gender equity
- Written minutes for all Gender Equity Review Committee Meetings
- Letters/written communications regarding Title IX
- A record of any complaints regarding gender equity
- Written booster club agreements
- Records of all Student Athletic Interest Surveys
- All board approved salary schedules for coaches
- Sample schedules for all sports for the past two (2) years
- Written team practice schedules
- School sponsored season (fall, winter, spring) sport schedules and game programs
- School district facility planning documents relating to gender equity
- Written facility usage schedules for all athletic facilities that are shared
- Written designation of locker room space assigned to each team
- Written policies regarding awards and recognition of athletic accomplishments
- Written rotation and replacement plan for uniforms
- Written policies for per diem during team travel
- School generated athletic handbooks
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The KHSAA keeps copies of annual reports, the school's original audit, revisit information, and other records on file. Schools may inquire about receiving a copy from the KHSAA if needed.

Annual Verification of Title IX Procedures

By April 15 of each year, schools must submit their Title IX Annual Report verifying current Title IX procedures to the KHSAA for review. If a school is found to have inequities, the GERC will be provided an opportunity to develop a timetable for and implement corrective action. The recommended time period for such implementation will be determined by the KHSAA and may vary based on the nature of the compliance issues and financial implications.

High School Audit and Revisit Program

In partnership with the Kentucky Department of Education, the KHSAA is maintaining an ongoing effort to ensure Title IX compliance at all KHSAA member high schools. Those schools selected for a revisit audit will be notified in late summer each year. The KHSAA office will contact schools to schedule the specific date for the audit. A

timetable and agenda for the audit is given to schools. Upon notification, each school will receive forms that request information from or for:

- The athletic participation opportunities section of the annual report forms for the past three years
- The corrective action plan of the annual report for the past five years
- Benefits including scheduling, coaching, and support services
- Athletic expenditures for the past two years

These forms must be returned to the KHSAA before the scheduled audit team visit.

The visit consists of a number of actions including, but not limited to, a review of the permanent Title IX file, a tour of athletic facilities, interviews with school administrators, coaches, and student athletes, and a meeting with the school Gender Equity Review Committee. The audit concludes with an opportunity for a public meeting.

Following the visit, each Principal, Athletic Director and Superintendent of the school visited receives a copy of the Final Report describing the Findings and Recommendations made by the KHSAA Title IX Audit Team members.

KBE Reporting Process

The KHSAA staff submits Title IX compliance reports regularly to the Kentucky Board of Education. These reports include any deficiencies noted at KHSAA member schools from the audit re-visits and from the annual reports submitted by all 278 schools by April 15th of each year. Corrective action plans and time tables for improvement are included. Schools that have habitual deficiencies or are resistant to Title IX compliance are subject to sanctions by the KHSAA and the Kentucky Board of Education.