Title IX Compliance Initiatives

Kent ISD & OK Conference

Kent ISD
We Lead Learning

Title IX & the OK Conference

"A Brief History and Overview"

The OK Conference has been a leader in advancing opportunities for both genders in our athletic programs. We realize the impact that sports participation can have on a young person's life. We believe in the values of teamwork, dedication and discipline; values that athletic participation can teach. To that end, the OK Conference encourages all of our member schools to provide fair and equitable opportunities for all of our student-athletes and to expand programs as the need arises and the student interest survey demonstrates.

What is Title IX?

Title IX was the first comprehensive federal law to prohibit sex discrimination against students and employees of educational institutions. Title IX benefits both males and females, and is at the heart of efforts to create gender equitable schools. The law requires educational institutions to maintain policies, practices and programs that do not discriminate against anyone based on sex. Under this law, males and females are expected to receive fair and equal treatment in all areas of public schooling, including athletics.

> **No person in the United States shall, on the basis of sex, be excluded from participation in, or denied the benefits of, or be subjected to discrimination under any educational program or activity receiving federal assistance.**
>
> **- Title IX of the Education Amendments of 1972 to the Civil Rights Act of 1964**

What school levels are covered by Title IX?

Title IX protects students, faculty and staff in federally funded education programs. Title IX applies to all elementary and secondary schools, colleges and universities. It also applies to programs and activities affiliated with schools that receive federal funds and to federally funded education programs run by other entities such as correctional facilities, health care entities, unions and businesses.

Who is responsible for enforcing Title IX?

Every school, by law, is required to designate a Title IX Coordinator. Contact information for the Title IX Coordinator must be readily available to school faculty, staff and students. Title IX coordinators as well as all faculty, students, coaches, and community members can file a complaint of a Title IX violation with the Office of Civil Rights.

Is there a penalty for Title IX non-compliance?

Schools can lose federal funds for violating the law. Although most institutions are not in compliance with Title IX, no institution has actually lost any federal money. Schools have, however, had to pay substantial damages and attorney fees in cases brought to court.

How do athletics comply with Title IX?

Title IX requires that schools, which receive federal funding, provide equal opportunities for members of both sexes. It addresses the availability, quality and kind of benefits, and the opportunities and treatment that athletes receive. Basic aspects of Title IX as applied to high school athletics are:

1) **Participation:**

   Title IX is not a quota system. Every institution has three options to demonstrate fairness in athletic opportunities. Schools can show that they comply with Title IX if they can demonstrate any *one* of the following:

   - Substantially proportionate athletic opportunities for male and female athletes
   - A history and continuing practice of expanding opportunities for the under-represented sex
   - Full and effective accommodation of the interests and abilities of the under-represented sex. Schools do not necessarily need to offer identical sports, yet they do need to provide an equal opportunity for student-athletes to play in sports where a student survey has shown a substantial interest.

2) **Additional Athletic Program Components:**

   Title IX also mandates equal treatment in the provision of:

   - Equipment, Supplies and Uniforms
   - Coaching
   - Scheduling
   - Facilities
   - Publicity
   - Medical/Athletic Training
   - Travel

The standard for compliance is one of quality rather than quantity. The actual amount of money spent on women's and men's programs may differ as long the quality of facilities and services for each program achieve parity. For example, equipment needed for men's football may cost more than equipment needed by women's volleyball. Title IX compliance is achieved as long as both teams are given equipment of comparable quality.

Kent ISD and its member school districts, working in cooperation with the Communities for Equity (CFE) Title IX advocacy group, developed a number of instruments to continually monitor schools' efforts to ensure athletics programs are fair and equitable for all students.

Title IX Today – School Responsibilities

- **Title IX Annual Compliance Reports:** These are required yearly by the OK Conference. The number and gender of participants in each high school's sports program along with the percentage of those athletes as compared with the total enrollment of the entire school are gathered. Along with participant information, there are the support services that each gender's sport program receives along with a comparison of the male and female coaching salaries districtwide. These annual reports are to be made available and distributed at least three times per year at each school's parent night meetings or a similar gathering.

  Collected Annually

- **OK Conference student-interest survey**. Our second data-gathering instrument is a survey conducted every three (3) years by each high school in Kent County. The student interest survey will highlight and illustrate for school districts where the needs might be arising in our emerging sports programs. Each district is required to have a policy in place to assist with meeting those emerging needs and interests (i.e. "Criteria for Adding Sports"). First done OK CONFERENCE wide in the spring of 2007, the next required survey will be administered in the spring of 2019.

  Upcoming Dates:
  Spring 2019
  Spring 2022
  Spring 2025
  Spring 2028

- **OK Conference Gender Equity Comprehensive Audit (GECA).** Our final data collection instrument is our most thorough. The **Information** and reports for data for the GECA will be gathered by a committee of school and community people; the data will be verified by the school or district's Title IX coordinator and the district's superintendent and board of education. The GECA will be completed every five years with the initial report being submitted for final board approval in May of 2009. Information for the May 2019 GECA will be based on facts and figures from the 2017-2018 school year.

  Approval dates on a 5-year rotation and information will be based on the previous school year.

  Upcoming Dates:
  May 2019
  May 2024
  May 2029
  May 2034

Title IX Reporting & Activity Calendar: 2018-19

August 15, 2018: By August 15 of 2005, and each year thereafter, districts will electronically submit Title IX Compliance Report to Kent ISD. This is the annual athletic participation and budget data authorized by KISA in May 2005. Documents to be submitted are:

- Participation & Coaching Data Worksheet
- Title IX Annual Compliance Report Worksheet
- Athletic Opportunities & 3-Part Title IX Compliance Worksheet

Sept: 18, 2018 – 7:30 a.m. - Annual Title IX Meeting – Kent ISD ESC Building - Coldwater Room

Athletic Directors and Title IX Coordinators will meet in September each year to review data submitted in August and discuss any issues related to Title IX reporting and compliance. This year's meeting will be held at 8:45 a.m. just prior to the first AD meeting for the 2017-18 school year.

Beginning of Each Athletic Season:

Districts will provide to parents and athletes the information contained in the Participation & Coaching Data Worksheet, the Title IX Annual Compliance Report, and the Athletic Opportunities & 3-Part Title IX Compliance Worksheet. Parents and athletes also will receive copies of the district's nondiscrimination form and grievance procedure.

2018-2019:

August 15, 2018 **2017-2018 Annual Compliance report due**

January 2019 **Student Interest Survey**

(Due June 2019) Athletic Directors and Title IX Coordinators begin process for distribution and completion of Student Interest Survey. Survey results are to be submitted **by June 1, 2019**. The survey was first completed on June 1, 2007 and most recently completed on June 1, 2016 and is to be completed every three years thereafter.

June, 2019 **Gender Equity Comprehensive Audit (GECA)**

Complete the Gender Equity Comprehensive Audit (GECA) of Title IX Compliance stipulated by KISA in 1998 **by June 2019**. This was completed April 2014 and submitted to school boards for their review in May/June 2014 and is to be completed every five years thereafter. The date has been moved to June for 2019 due to the Student Interest Survey completion falling in the same year. Information for the Gender Equity Comprehensive Audit of Title IX Compliance is located on the Kent ISD website.

RK:cc

ANNUAL COMPLIANCE REPORT

2018 Revision

2017-18 Title IX Annual Compliance Report

DATE **August 1, 2018**

Compliance Year 2017-18			**(Sample District)**
1	**Total 9th-12th Enrollment**	**M**	
		F	
2	**Total athletic participants**	**M**	
		F	
3	**Prime Time contests***	**M**	
		F	
4	**Number of Home Events**	**M**	
		F	
5	**Prior to each sports season, do athletes/parents receive documentation/website links to district's non-discrimination policy, grievance procedures and Title IX compliance survey?**		
6	**Do you have a Title IX coordinator?**		
7	**Conducted a student interest survey in athletic participation**		
8	**Survey Previewed by Title IX Coordinator**		
9	**Comprehensive Survey Completed**		

In boxes 10-15, please specify the number of dates for which these support activities were present.

10	**Sideline Cheer**	**M**	
		F	
11	**Concession**	**M**	
		F	
12	**Pep Band**	**M**	
		F	
13	**Programs**	**M**	
		F	
14	**Pep Assembly**	**M**	
		F	
15	**Announcers**	**M**	
		F	

*** Prime Time Contests are classified as contests held where there is no school the following day.**

2017-18				Date Completed:	SAMPLE							
District:												
	Participation by Sport Indicate Sports teams at your institution:				Varsity Head Coaches (Paid By District)				Assistant Coaches (Paid Positions By The District)			
	# of participants				Male Teams		Female Teams		Male Teams		Female Teams	
Example	*Male*	*Fee in addition to Pay to Participate*	*Female*	*Fee in addition to Pay to Participate*	# of Coaches	Total Coaching Salary	# of Coaches	Total Coaching Salary	# of Coaches	Total Coaching Salary	# of Coaches	Total Coaching Salary
Basketball	*25*	*$25.00*	*36*	*$20.00*	*10*	*$3,000.00*	*7*	*$1,500.00*	*9*	*$2,000.00*	*3*	*$900.00*
Sport												
Basketball												
Football												
Track & Field												
Wrestling												
Soccer												
Baseball												
Softball												
Cross Country												
Tennis												
Golf												
Competitve Cheer												
Ice Hockey												
Bowling												
Volleyball												
Swimming												
Lacrosse												
Ski												
Crew												
Totals:	0	$ -	0	$ -	0	$ -	0	$0.00	0	$0.00	0	$0.00

Co-ed Teams and are reflected in both gender columns (Track & Field, Cross County, Bowling)

Page 2 of 3

ATHLETIC PARTICIPATION OPPORTUNITIES: Three Part Test

2017-18

Date Completed: **SAMPLE**

DISTRICT:

Prong #1 - Substantial Proportionality

	Boys	Girls	Total Boys & Girls	% Boys	% Girls
Total Enrollment 9-12			0	#DIV/0!	#DIV/0!
Total Athletic Participants			0	#DIV/0!	#DIV/0!
Variance				#DIV/0!	#DIV/0!

Athletic participants are defined as those students who are members of a team on their first date of competition. Participation opportunities should be considered as the number of athletes who actually participate in a program. Participants are counted for each team on which they participate. For example, one individual participating during the fall, winter and spring sport season is counted as three participants. Members of a team who left the team prior to the first competitive contest are excluded from the count. Support groups (pom poms, sideline cheer) should not be counted in the rate of participation.

The percentage of male and/or female athletes should be "substantially proportionate" to the percentage of male or female students enrolled. Example: If boys are 52% of enrollment and 60% of athletes and girls are 48% of enrollment and 40% of athletes, there is an 8% difference (52%-60% or 48%-40%) between rates of enrollment and rates of participation for boys and girls. This figure should be zero.

Prong #2 - History & Continuing Practice of Program Extension

Opportunities must be provided when there is sufficient interest and ability among the underrepresented sex to sustain a viable team and am reasonable expectation of competition for that team. Programs like club or intramural sports programs may show interests that are not being met. Review a copy of the Student Interest Survey to see if the interests and abilities of the underrepresented gender are fully and effectively accommodated by the current program.

(The Student Interest Survey in itself is just a tool. It is but one resource for schools to use before choosing Prong #3)

Prong #3 - Interests & Abilities

Copy of Student Interest Survey: Are the interests and abilities of the underrepresented gender fully and effectively accommodated by the current program?

OK CONFERENCE
STUDENT INTEREST
SURVEY

2018 Revision

Section A-1

OK Conference Student Interest Survey
Part I
Interscholastic Athletic Programs

This survey contains no information that will identify you. You are not required to participate in this survey but we do encourage you to complete this so that your school can better determine what programs and activities they might offer for future planning.

1. What is your grade level?
   - ☐ 7th
   - ☐ 8th
   - ☐ 9th
   - ☐ 10th
   - ☐ 11th
   - ☐ 12th

2. What is your gender?
   - ☐ Female
   - ☐ Male

3. Are all the sports that you are interested in offered at your school?
   - ☐ Yes
   - ☐ No
   - ☐ I am not interested in athletics participation

4. Are you able to participate in the sports in which you are interested that your school offers?
   - ☐ Yes
   - ☐ No. If "no", why not? (please check all that apply)
     - ☐ Not enough squads
     - ☐ Tried out but did not make the team
     - ☐ Conflicting after school responsibilities
     - ☐ Two sports offered at same time
     - ☐ Parents' wishes
     - ☐ Low grades
     - ☐ Conflict with coach
     - ☐ Cost
     - ☐ Working at outside job
     - ☐ Other: _____

5. Considering your other interests and responsibilities, the time required for sports practices and contests and the time of the year that a sport is or would be offered (if known), would you

participate in the following sport(s) if the opportunity were available to you? (Please check no more than four.)

FALL SEASON:

Girls:	**Boys:**
☐ Volleyball	☐ Football
☐ Cross Country	☐ Cross Country
☐ Swimming & Diving	☐ Water Polo
☐ Golf	☐ Tennis
☐ Sideline Cheer	☐ Soccer

WINTER SEASON:

Girls:	**Boys:**
☐ Basketball	☐ Basketball
☐ Competitive Cheer	☐ Wrestling
☐ Gymnastics	☐ Hockey
☐ Skiing	☐ Skiing
	☐ Swimming & Diving

SPRING SEASON:

Girls:	**Boys:**
☐ Softball	☐ Baseball
☐ Track & Field	☐ Track & Field
☐ Tennis	☐ Golf
☐ Soccer	
☐ Water Polo	

6. Please list any other sport you would like to see added:

7. Students currently involved in athletics should answer the following questions:
   a. Are the following resources equally available to female and male athletes?
      i. Support groups at contests (pep band, cheerleaders, etc.) ☐ Yes ☐ No
      ii. Access to the use of video equipment (VCR, monitor) ☐ Yes ☐ No
      iii. Distribution of publications (flyers, posters, programs) ☐ Yes ☐ No
      iv. Local newspaper articles ☐ Yes ☐ No
      v. Daily announcements (upcoming events, results) ☐ Yes ☐ No

8. Is the school providing equal promotions for boys' and girls' teams? ☐ Yes ☐ No

9. Is the school providing an equal amount of publications for the boys' and girls' teams, such as programs and flyers? ☐ Yes ☐ No

10. If resources are not equally available, what could be changed?

Section A-2

OK Conference Student Interest Survey
Part II
Co-Curricular Activities

Co-curricular activities are organized activities, sanctioned by the school, that may occur before or after school and may or may not involve competing with other schools.

For each of the following co-curricular activities, please indicate how interested you would be in participating.

A – I would really like to participate.
B – I might like to participate.
C – I would <u>not</u> participate.

A	B	C	
☐	☐	☐	**Band**
☐	☐	☐	**Cheerleading**
☐	☐	☐	**Chess Club**
☐	☐	☐	**Computer Club**
☐	☐	☐	**Debate/Forensics**
☐	☐	☐	**Drama**
☐	☐	☐	**Foreign Language Club**
☐	☐	☐	**Journalism/Newspaper**
☐	☐	☐	**Key Club**
☐	☐	☐	**National Honor Society**
☐	☐	☐	**Pep Club**
☐	☐	☐	**Pep Band**
☐	☐	☐	**Vocal Music**
☐	☐	☐	**Yearbook**
☐	☐	☐	**Other**
☐	☐	☐	**Other**

OK CONFERENCE
GENDER EQUITY
COMPREHENSIVE AUDIT
(GECA)

2018 Revision

APPENDIX E
OK Conference
Gender Equity Comprehensive Audit

In 1995, the OK Conference developed a Gender Equity Resource Guide for all of the schools to use. In 2007, the OK Conference reviewed the Resource Guide and developed the following program components that schools would use as resources to evaluate gender equity in their current school programs.

- Student Interest and Abilities Survey
- Equipment and Supplies
- Scheduling
- Facilities
- Coaching
- Publicity
- Medical and Training
- Travel per Diem

The intent of this Gender Equity Comprehensive Audit is to provide conference members with an organized reporting system.

Committee Members:
Dave Price, Athletic Director, Wyoming Rogers (Chair)
Bob Dailey, Athletic Director, Northview
Eric Haik, Athletic Director, Godwin Heights
Blaine Brumels, Athletic Director, East Kentwood
Cheri Ritz, Athletic Director, Wayland
Walt Gawkowski, Athletic Director, Mona Shores
Jim Haskins, OK Conference
Ron Koehler, KISD

Current Committee Members 2018:
Blaine Brumels, Athletic Director, East Kentwood
Dee Crowley, Athletic Director, Lowell
Ted Hollern, Athletic Director, Wyoming
Blake Muller, Athletic Director, Byron Center
Kelly Rider, Athletic Director, Sparta
Tim Ritsema, Athletic Director, Jenison
Daniel Russell, Athletic Director, Kelloggsville
Jim Haskin, OK Conference Commissioner
Ron Koehler, Kent ISD

Special recognition to the states of Washington and Kentucky for sharing their Gender Equity Comprehensive Audit information with our Conference.

OK Conference Gender Equity Comprehensive Audit

The superintendent of schools will ensure that a Gender Equity Comprehensive Audit (GECA) will be performed at least every five (5) years in the district and such audit will be done by a gender equity review committee for each school.

The committee will be composed of the following personnel:

School or district Title IX Coordinator
Athletic Administrator
High school administrator
Male coach
Female coach
Booster club representative
Parent of female athlete
Parent of male athlete
Faculty representative
Athletic trainer
Male student-athlete
Female student-athlete

It is expected that the Title IX coordinator and/or the school's athletic administrator will be the chair(s) for the review committee.

Times for the full committee meetings shall be such as to ensure a majority, if not all, members are in attendance.

The review committee will be charged with gathering, compiling and evaluating the data collected from staff, student-athletes and parents concerning the effectiveness of each school's gender equity program as it relates to high school sports.

The OK Conference Gender Equity Committee strongly suggests that the following timelines be followed so as to allow ample time in the months of March and April 2019 to compile and evaluate the data collected.

It is further recommended that you begin as early as spring (2018) to collect information and data from your fall coaches and sports programs (see suggested timelines below).

SECTION	**TARGET COMPLETION DATE**
Section C – Coaching	October 1, 2018
Section B – Equipment, Supplies & Uniforms	October 15, 2018
Section E – Facilities	November 1, 2018
Section D – Scheduling	November 15, 2018
Section G – Medical/Athletic Training	December 1, 2018
Section F – Publicity	February 1, 2019
Section H – Travel	February 15, 2019
Board of Education Presentation	May 1 – June 15, 2019

OK CONFERENCE GENDER EQUITY COMPREHENSIVE AUDIT
VERIFICATION OF FORMS MAY – JUNE 2019

_____ _____, Michigan certifies to the KISD
(High School) (City)

that the following audit is an accurate and true representation of the facts and data regarding our district's compliance with Title IX of the Education Amendments of 1972 to the Civil Rights Act of 1964; as it pertains to our district and school's athletic program.

Please identify the following:

School District Title IX Coordinator

Name	
Professional Title	
Phone Number	( )
Address	

School Title IX Coordinator

Name	
Professional Title	
Phone Number	( )
Address	

The following signatures verify the authenticity of the document:

	Signature	Date
Principal		
School Title IX Coordinator		
District Title IX Coordinator		
Superintendent		
School Board President		

_____ High School's Gender Review Committee was composed of the following members. Verification of their membership is noted by their signature below.

Member Name	Title	Signature	Date	( ) *

*Check mark indicates committee member has reviewed the final document.

Section A

OK Conference Gender Equity Comprehensive Audit
Interests and Abilities
Overview

Under both Michigan and federal law, school districts are required to effectively accommodate the athletic interests and abilities of students of both sexes to the extent necessary to provide equal athletic opportunity. A three part test was developed to determine that equality under federal and state law.

A district may be in compliance if it meets any part of the three part test.

Part 1

The first part of the three part test is a comparison of the ratio of female to male participation in interscholastic athletic programs to the ratio of female to male student enrollment. The ratio is a comparison of the number of participants not the number of girls' and boys' teams. A common misconception is that if there is a significant difference between the ratios then the school district is not in compliance. This is not correct. Your district may still be in compliance is it can show progress with Part 2 or 3 of the three-part test.

Part 2

If Part 1 reveals that one sex is under-represented in the district's athletic program, a district may still be in compliance if the district can show a history and continuing pattern of program expansion for the under-represented sex. A history and continuing pattern would entail a review going back at least a decade and would consider whether sports were added in response to the existing and emerging interests of students for new opportunities, whether there is a clear and effective method for adding new sports and whether there is currently a plan to add more sports in response to an identified interest.

Part 3

If a district cannot meet Part 1 or Part 2 of the three-part test, it still may be in compliance if the current program can be shown to be effectively accommodating the interests and abilities of the under-represented sex. If a district can show that there are sound and effective methods for determining interest and that the current program is addressing all known interest, then it is in compliance even if there is a disparity in the ratio of students participating in sports to the students enrolled.

In this section, the school and district will collect information on the interest in athletics and activities (Bylaws 1 and 2). This student survey is to be completed every three years (next to be completed in June 2010); the interscholastic athletic participation and enrollment rates and coaching information (Title IX Compliance Report sent to the KISD and compiled by the KISD each year) for boys and girls sports. This information will be analyzed to determine if any steps need to be taken to increase the participation opportunities for the underrepresented sex.
(Refer to Section A-1 and Section A-2 in the Student Interest Survey Section)

Section B

OK Conference Gender Equity Comprehensive Audit
Equipment, Supplies and Uniforms

Checklist for gender equity equipment, supplies and uniform audit:

1. Collect needed information for each team (sport and level) using the attached forms (B-1) about the availability of necessary equipment and supplies. For the purposes of the audit the following will be considered:

    a. Equipment – Items purchased by the sport, boosters or athletic department that under normal conditions will last for more than one (1) year.

    b. Supplies – Items purchased by the sport, boosters or athletic department that under normal conditions last for less than one (1) year (consumable items).

    c. Uniforms – Cloth items purchased by the sport, boosters, athletic department or individual athlete for use in practice or interscholastic athletic contests.

    The forms should be completed by the head coach of that sport and level or by the varsity head coach for all levels with input, where appropriate, from other coaches and team members. Completed forms should be returned to the athletic director or Title IX officer for the district.

2. Based on the forms completed by all the teams in a given district, the information should be compiled and analyzed (form B-2) to assess whether female and male athletes, district wide, are being given equal opportunities regarding equipment, uniforms and supplies.

3. The Title IX officer will complete the certification form (attachment B-3) for equipment, supplies and uniforms and attest that steps 1 & 2 above have been completed. The certification form will include the district plans for addressing areas of deficiencies identified by the analysis in Step 2. Once every five (5) years as part of the certification process, the comprehensive audit will be completed and a certification form signed by the superintendent will be forwarded to the Kent Intermediate School District.

B-1

OK Conference Gender Equity Comprehensive Audit
Equipment, Supplies and Uniforms
Team Worksheet

School _____

Sport _____ Gender _____ Level _____

Number of Participants _____
(at end of season)

Head Coach _____

For the purposes of this worksheet:

1. **Equipment** – Items which will last for more than one (1) year; i.e. pitching machines, mats, gymnastics equipment, VB standards, conditioning or weight training equipment, etc.
2. **Supplies** – Items that under normal conditions last for less than one (1) year (consumable items); bats, balls, basketball nets, etc.
3. **Uniforms** – Cloth items for use in practice or interscholastic athletic contests; game jerseys, warm-ups, rain gear, shoes, etc.

Stationary equipment such as basketball backboards, soccer goals, football goals, tennis standards will be reviewed under the facilities component.

During the most recent completed school year (2017-18) the following were purchased for use with the team listed above:

1. List the equipment provided to your team or team members by the school district:

2. List the supplies provided to your team or team members by the school district:

3. List the cloth items provided to your team or team members by the school district:

4. List the equipment provided by participants themselves:

5. List the supplies provided by participants themselves:

6. List the cloth items provided by participants themselves:

7. List the equipment provided by other sources (i.e. boosters, donations, manufacturers):

8. List the supplies provided by other sources (i.e. boosters, donations, manufactures):

9. List the cloth items provided by other sources (i.e. boosters, donations, manufactures):

10. Do student-athletes pay a participation fee? How much? How often?

11. What is your equipment and supply budget for the current year (2013-2014) from the school district?

12. What was the equipment and supply budget for the previous year (2012-2013) from the school district?

13. What was the uniform budget for the current year (2013-2014)?

14. What is the uniform budget for the previous year (2012-2013)?

15. Is the quality of the equipment, supplies and uniforms provided to this team satisfactory?

16. Do they meet all NFHS and MHSAA regulations and standards?

17. Who is responsible for the ordering, collecting and inventorying of the equipment, supplies and uniforms?

18. Are the equipment, supplies and uniforms for your team appropriately maintained and replaced when needed?

19. Is adequate storage provided for all equipment, supplies and uniforms? If not, please explain.

20. Overall, is the budget available for this team adequate?

21. Do you believe that the equipment, supplies and uniforms provided to your team may deny the team equal treatment and opportunities? Explain.

22. Do you fundraise?
    a. Is your activity account kept by the school district?

    b. Balance in your activity account at the conclusion of present school year (2012-2013)?

    c. How are and for what types of items are your activity account monies disbursed?

23. Additional comments:

B-2

OK Conference Gender Equity Comprehensive Audit
Equipment, Supplies and Uniforms
School/District Worksheet

On form B-1, the school or district gathered information about each team using the team worksheets. On form B-2 the district or school will compare the information from your teams about the equipment, supplies and uniforms provided to those boys' and girls' teams. To complete this section and the required certification form (B-3), you will be asked to make a number of judgments about the comparability of the treatment of boys' and girls' teams in the area of equipment, supplies and uniforms.

Based on the information acquired from the different teams in your program, carefully consider and answer the following questions for the program and district as a whole. The objective is to arrive at a conclusion about whether, in the program as a whole, there are substantial differences in the treatment of boys' and girls' teams.

1. Do the team worksheets reflect a disparity between the boys and girls teams regarding the amount of equipment, supplies and uniforms provided by the participants themselves?

2. Is there a difference between participation fees charged to members of boys' teams and to members of girls 'teams? If there is a difference, why?

3. Is there a disparity in the budget for the girls' teams and the boys' teams in the overall program? If there is a difference, why?

4. Is there a disparity in the budget for the similar girls' and boys' teams in the overall program (i.e. basketball, track, swimming, etc.)? Attach a copy of your yearly (2012-2013) athletic budget. If there is a difference, why?

5. Is there a disparity in the number of girls' and boys' teams that report dissatisfaction with the quality of their equipment, supplies and/or uniforms?

6. Is there a disparity in the number of boys' and girls' teams reporting that their equipment, supplies or uniforms are suitable and meet NFHS and MHSAA standards?

7. Is there a disparity in the number of boys' and girls' teams reporting that their equipment, supplies and uniforms are adequately maintained and replaced as needed?

8. Is there a disparity in the number of boys' and girls' teams reporting that their equipment, supplies and uniforms are adequate?

9. Is there a disparity in the number of boys' and girls' teams indicating that the equipment, supplies and uniforms provided for their team may deny their team equal treatment and opportunities?

10. For the disparities or differences that you identified above, have you found that there is a significantly greater percentage of girls' or boys' affected?

Overall conclusion:

District or program action steps being taken to address equipment, supplies or uniform disparities:

School District	Board of Education Representative
Title IX Coordinator	Date
Superintendent	

B-3

OK Conference Gender Equity Comprehensive Audit
Equipment, Supplies and Uniforms
Certification Form

This form is to be used by a school district to report to KISD the results of its self-evaluation of its provision and maintenance of its athletic equipment, supplies and uniforms. This form should be completed by a representative group of individuals designated for that purpose by the superintendent. The completed forms should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

		YES	NO
1.	Have you evaluated whether the girls' and boys' athletic programs are provided with equipment, supplies and uniforms on an equivalent basis?	☐	☐
2.	Did the evaluation include a survey of the equipment, supplies and uniforms regularly provided to each girls' and boys' team?	☐	☐
3.	Did you compare the equipment, supplies and uniforms provided to the girls' and boys' teams based upon the following factors: a. Quality b. Quantity c. Suitability for sport d. Maintenance and replacement	☐	☐
4.	Have you identified a disparity between the equipment, supplies and uniforms for the girls' and boys' programs for any of the factors listed above?	☐	☐
5.	If there are disparities, do they favor, overall: a. Girls' team? b. Boys' teams?	☐	☐

Action steps taken to address disparities in equipment, supplies and uniforms:

_____ _____
School District Board of Education Representative

_____ _____
Title IX Coordinator Date

_____
Superintendent

Section C

OK Conference Gender Equity Comprehensive Audit
Coaching
Overview

In Section C – information will be gathered and verified regarding the coaching for girls' and boys' teams. Three main areas are evaluated:

1. Opportunity to receive coaching (How much coaching is provided?)
2. The qualifications of coaches
3. The compensation of coaches

Evaluators should also consider elements inherent in any evaluation of coaching:

Two elements to consider for the opportunity to receive coaching:
1. Availability of full-time coaches for girls' and boy's teams
2. Availability of part-time and assistant coaches for girls' and boys' teams

Two elements to consider for the qualification of coaches:
1. Training, experience and other professional qualifications
2. Professional standing

Ten elements to consider for the compensation of coaches:
1. Rate of compensation (per sport, per season)
2. Duration of contract (length of season)
3. Experience
4. Nature of coaching duties performed
5. Working conditions
6. Community/School expectations
7. Team/squad sizes
8. Adults supervised
9. Off season responsibilities
10. *Value of equipment, supplies and uniforms

Under certain circumstances, some coaching positions can and should be excluded from your analysis. These coaching positions are for combined or "co-ed" teams. "Combined teams" refers to sports where the girls' and boys' teams have the same coach(es) and practice, and compete at the same or similar times and locations. Coaches for combined teams may be excluded from the analysis unless more coaching time is spent with athletes of one sex. Do not arbitrarily determine that a sport (i.e. wrestling) is coed simply because both sexes may compete on that team.

The primary focus of your analysis should be the degree of coaching services made available to the girls' and boys' sports and whether the amount of such services is meeting the needs of girls and boys to a comparable degree. Availability of qualified coaching is most directly related to the benefits received by your student-athletes.

For qualifications (assignment) of coaches you will determine if there is a pattern of assigning less qualified coaches to one program for students of one sex more than the other. The reason for relying on an overall pattern with all your programs is because measurable qualifications do not always translate over into higher quality coaching.

Compensation for coaches must be part of your evaluation but unequal compensation of girls' and boys' coaches may not itself be enough for your program to be considered out of compliance with athletic equity laws. If the amount of coaching services ((opportunity to receive coaching) and the qualifications of coaches in both the girls' and boys' programs are equivalent; it may be difficult to establish that lower compensation for coaches in the girls' program, for example, negatively affects female athletes.

In the following sections (C-1, 2, 3) the district will collect and analyze information on the availability, qualifications and salaries/compensation of coaches. The information will be analyzed to determine if any steps need to be taken to address disparities in the coaching provided girls or boys.

Checklist for gender equity comprehensive audit of coaching:

1. Collect needed information for each coach and assistant coach for each team using the attached form (C-1). If the team has more than one coach or assistant coach, each person should complete a separate form.

   Completed forms should be returned to the athletic director or Title IX officer for the district.

2. Based on the forms (C-1) completed by all the coaches in a given district, the information should be compiled and analyzed (form C-2) to assess whether female and male athletes, district wide, are being given equal opportunities regarding to receive coaching services.

3. The Title IX officer will complete the certification form (attachment C-3) for program component and attest that steps 1 & 2 above have been completed. The certification from will include the district plans for addressing areas of deficiencies identified by the analysis in step 2. Once every five (5) years as part of the certification process, the comprehensive audit will be completed and a certification form signed by the superintendent attesting to the evaluation of coaching services district wide will be forwarded to the Kent Intermediate School District.

C-1

OK Conference Gender Equity Comprehensive Audit
Coaching
Coach Worksheet

School _____

Sport _____

Level _____ Number of participants _____

Your name _____ ☐Female ☐Male

Circle (or place check mark) as applicable:

☐Head Coach ☐Assistant Coach ☐Volunteer Coach ☐Faculty ☐Non Faculty

1. How much time do you spend, on average, actually coaching each week (Monday-Sunday)?

2. How much time do you spend, on average, preparing each week (Monday-Sunday)?

3. Is the amount of time spent coaching and preparing each week adequate?

4. Describe your coaching experience in this sport (number of years, high school – college, levels).

5. Describe your playing experience in this sport (years, level, where).

6. Describe your coaching experience in other sports (sport, years, level, where).

7. Describe your playing experience in other sports (sport, years, level, where).

8. Describe other qualifications for coaching this sport? (e.g. summer camps, writing, clinics, speaking)

9. Your salary and length of contract for the present school year in this sport is:

Additional comments (i.e. concerns/ideas to improve your program):

C-2

OK Conference Gender Equity Comprehensive Audit
Coaching
School/District Worksheet

On form C-1 the district gathered information from each team coach on the amount of coaching provided, the coach(es) qualifications and their compensation. Now use this school/district worksheet (C-2) to compile the information on coaching and evaluate the equity of coaching services provided to the girls' and boys' teams.

It is essential in determining whether there is a disparity in coaching that you consider the number of girls' and boys' teams affected and the actual number of participants affected. The number of participants on each team may vary greatly; simply comparing the number of teams reporting problems will not give you a complete measure of whether female and male athletes in the district are being treated equally as a whole.

The top of each coach's worksheet (C-1) should indicate the number of participants on that particular team. You will need these numbers to conduct the calculations needed to answer some of the questions below.

Based on the coaching information gathered, carefully consider and answer the following questions for the district as a whole. Your objective is to determine whether, in the district wide athletic program as a whole, there are differences in the treatment of boys and girls in coaching.

1. How many paid coaches (head and assistant) are there in the girls' program district-wide?

2. How many volunteer (unpaid) coaches are there in the girls' program district-wide?

3. How many paid coaches (head and assistant) are there in the boys' program district-wide?

4. How many volunteer (unpaid) coaches are there in the boys' program district-wide?

5. What is the ratio of the total number of paid coaches to the total number of girls participating?

6. What is the ratio of the total number of paid coaches to the total number of boys participating?

7. What is the ratio of the total number of paid and volunteer coaches to the total number of girls participating?

8. What is the ratio of the total number of paid and volunteer coaches to the total number of boys participating?

9. Is there a difference in the number of girls programs that have assistant coaches with the number of boys programs that have assistant coaches?

10. Is there a difference along gender lines in the number of coaches who identify that the amount of coaching provided to their team is inadequate to meet the needs of their team?

11. Compare the training, experience and other professional qualifications of the coaches assigned to the boys' program with the coaches assigned to the girls' programs.
    a. Are there noticeable differences? What are they?

    b. If there are differences, are they the result of discriminatory hiring practices based on the gender of team participants?

    c. Do the differences result in a different level of quality in coaching for one sex over the other? Explain

    d. How do the differences affect the coaching provided?

12. Compare the salaries of the coaches for girls' sports with the salaries of coaches for boys' sports.
    a. Are there noticeable differences?

    b. Are these differences in salaries a result of factors; such as...the nature of their duties, the experience of individual coaches, the number of participants, the number of coaches supervised?

    c. Does any difference in compensation result in a disparity on the coaching afforded to the boys' or girls' programs?

13. For any of the disparities or differences that you identified above, have you found that there is a significantly greater percentage of girls or boys affected overall?

Overall conclusion:

Action steps taken to address coaching concerns:

C-3

OK Conference Gender Equity Comprehensive Audit
Coaching
Certification Form

This form is to be used by a school district to report to KISD the results of its self-evaluation of practices related to equal opportunities to receive coaching. This form should be completed by a representative group of individuals designated for that purpose by the superintendent. The completed forms should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

		Yes	No
1.	Have you gathered information on the amount of coaching provided to the boys' and girls' teams?	☐	☐
2.	Have you evaluated the training, experience and professional qualifications of your coaching staff?	☐	☐
3.	Have you evaluated the compensation received by coaches?	☐	☐
4.	Does the information gathered and analyzed regarding coaching indicate that there is an overall disparity between coaching services afforded to boys and girls? Explain	☐	☐
5.	If there is a disparity, are there nondiscriminatory factors that explain the disparity? If yes, please explain.	☐	☐

Action steps taken to address coaching concerns:

District Employment Information:

1. Have you reviewed district hiring practices to ensure that they do not discriminate on the basis of sex?

2. Have you provided advancement opportunities in coaching to males and females?

Number of female coaches (including volunteers) _____
Number of male coaches (including volunteers) _____

School District	Board of Education Representative
Title IX Coordinator	Date
Superintendent	

Section D

OK Conference Gender Equity Comprehensive Audit
Scheduling Overview

In Section D – information will be gathered and verified regarding whether boys and girls receive equal benefits from the scheduling of games and practice times. This section is not just about the number and times of games. Rather, its overriding concern is the impact that unequal scheduling may have on factors such as the opportunity to participate, compete, attract media coverage, play in front of spectators and develop a strong overall program. There are five factors to be assessed in determining whether your district is providing equal opportunity:

1. number of competitive events per sport;
2. number and length of practice opportunities;
3. time of day competitive events are scheduled;
4. time of day practices are scheduled; and
5. opportunities to engage in available competition.

There may be nondiscriminatory differences in scheduling due to the unique aspects of certain sports. Scheduling of competitive events, for example, may be limited by a lack of competition for a particular sport in the normal competitive region. Fewer competitive contests may in turn affect practice schedules and pre-season and post-season competitive opportunities.

Competitive and practice schedules are often affected by the availability of facilities. Usually, an investigation of the scheduling program component will overlap with an investigation into the program component that covers athletic facilities. When schedules for teams of one sex are adversely affected by the availability of facilities, a district may be out of compliance in both program components.

An institution is not required to schedule the same number of games or practices for boys' and girls' teams in the same or similar sport. However, such a disparity may suggest a larger problem and any differences favoring, for example, boys' teams, should be offset by differences favoring girls' teams in other sports.

Checklist for gender equity comprehensive audit of Scheduling:

1. Collect information from each squad, using form D-1, about the time, amount and quality of practice and game times. The D-1 form should ordinarily be completed by the coach for each squad with input, where appropriate, from team members.

2. Based on the form D-1 completed by all the coaches in a given district, the information should be compiled and analyzed (form D-2) to assess whether female and male athletes, district-wide are being given equal opportunities to practice and compete in their chosen sports. This step will require some direct comparing of objective information, and also some subjective judgments, such as whether the girls and boys have equal access to game times that are considered "prime".

3. The Title IX officer will complete the certification form (D-3) for program component and attest that steps 1 and 2 above have been completed. The certification form will include the district plans for addressing areas of deficiencies identified by the analysis in step 2. Once every five (5) years as part of the certification process, the comprehensive audit will be completed and a certification form signed by the superintendent attesting to the evaluation of Scheduling district wide will be forwarded to the Kent Intermediate School District.

D-1

OK Conference Gender Equity Comprehensive Audit
Scheduling
Coach's Worksheet

School _____

Sport _____

Level _____ Number of Participants _____

Your Name _____ ☐Female ☐Male

Circle (or place check mark) as Applicable:
☐Head Coach ☐Assistant Coach ☐Volunteer Coach ☐Faculty ☐Non Faculty

1. How many regular season contests does the team play:
   Home_____ Away_____

2. Is the number of regular season events adequate for the team's competitive level?

3. Is each squad participating in the maximum number of contests allowed by the MHSAA?

4. What days of the week and times are regular season contests played?

5. What days of the week and what times of day are considered "prime time", whether male or female, for this sport's contests?

6. What percentage of this squad's competitions occurred during prime time?

7. Do contest schedules permit reasonable opportunities to compete before student and community spectators?

8. What days of the week and times are practices? Is the practices schedule convenient?

9. When would be the preferred time for practices?

10. How long are practices?

11. Is the amount of practice time for this squad sufficient?

12. Do you believe there are contests or practice scheduling issues that may deny your team or athletes on our team competitive opportunities?
If yes, describe the issue(s):

Additional Comments:

D-2

OK Conference Gender Equity Comprehensive Audit
Scheduling
School/District Worksheet

On form D-1, the district information from each team coach on the scheduling of games and practices for their individual sport. Now use this school/district worksheet (D-2) to compile the information on coaching and evaluate the equity of scheduling provided to the girls' and boys' teams.

It is essential in determining whether there is a disparity in this area that you consider both the number of girls' and boys' teams affected and the actual number of team participants affected. Because the number of participants on each team will vary greatly, simply comparing the number of girls' and boys' teams reporting problems will not give you a complete measure of whether the male and female athletes in the district are being treated equally as a whole.

The top of each team worksheet should indicate the number of students participating on the team. You will need to use these numbers to conduct the calculations needed to answer some of the questions on the worksheet below.

Based on the information provided by each squad, you should compare the answers provided by girls' teams and boys' teams and then carefully consider and answer the following questions for the district as a whole. Your objective is to arrive at a conclusion about whether boys' and girls' are being treated equally in scheduling.

1. Overall, what percentage of maximum number of competitions allowed did the girls' and boys' team actually schedule?

2. Based on the above percentage, are girls' and boys' teams given equal opportunities to participate in the maximum number of competitions allowed for their team?

3. Is there a disparity between the number of games played at home for girls' and boys' teams? If yes, provide number.

4. Does the squad secure or receive invitations to out-of-state contests?

5. If a disparity exists in any of the above, is there a unique aspect about a team or teams of one gender that would explain the disparity? Explain.

6. Are boys' and girls' team given an equivalent opportunity to compete during "prime time"?

7. Are boys' and girls' teams given an equal opportunity to compete in front of spectators?

8. Are boys' and girls' teams given an equal opportunity to practice during preferred times?

9. Is there a disparity between the number of girls' and boys' teams that report an insufficient amount of time to practice?

10. Is there a disparity between the total number of girl and boy participants affected by an insufficient amount of time to practice?

11. Is there any pattern of girls' or boys' teams reporting that scheduling issues may be affecting their competitive opportunities?

Overall Conclusion:

Action Steps to Address Scheduling Disparities:

D-3

OK Conference Gender Equity Comprehensive Audit
Scheduling
Certification Form

This form is to be used by a school district to report to KISD the results of its self-evaluation of its scheduling of games and practice times. This form should be completed by a representative group of individuals designated fro that purpose by the superintendent. The completed forms should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

		Yes	No
1.	Did you compare the opportunities given to girls' and boys' teams to compete the maximum number of contests allowed for their sport?	☐	☐
2.	Have you compared the scheduling of games and practice times for all of your teams?	☐	☐
3.	Did your comparison include a consideration of the practice and game times that are considered prime times or the most preferable to the teams in question?	☐	☐
4.	Did the comparison of the scheduling of games and practice times identify any disparities that favor teams made up of players of one sex? If yes, describe:	☐	☐
5.	Do the differences overall favor athletes of one sex?	☐	☐
6.	Are there any nondiscriminatory justifications for the disparity? If yes, describe:	☐	☐

Action Steps to Address Scheduling of Games and Practice Times

School District	Board of Education Representative
Title IX Coordinator	Date
Superintendent	

Section E

OK Conference Gender Equity Comprehensive Audit
Facilities
Overview

In Section E – Information will be gathered and verified regarding the availability of facilities for boy's and girl's teams. The following areas will be evaluated:

1. An assessment of whether boys and girls receive equal treatment in the area of competitive and practice facilities, such as playing fields, gyms, courts, and swimming pools.

2. An assessment of whether they are given comparable locker rooms.

Any evaluation of a district's athletic facilities should consider the following areas:

1. Quality and availability of the facilities for boy's and girl's teams.
2. Whether any teams have exclusive use of a facility.
3. Availability, proximity, and quality of locker rooms.
4. Maintenance of facilities.
5. Level of preparation of facilities for practice and competitive events.

Checklist for gender equity comprehensive audit of facilities:

1. Collect information on the availability and quality of practice and competitive facilities and locker rooms for each team using the attached form (E-1). The form should be completed by the head coach for each team with input, where appropriate, from team members.

2. Based on the form (E-1) just completed by all teams in each district school, the information should be compiled and analyzed to assess whether male and female athletes, district-wide, are being given the benefit of equal practice and competitive facilities and locker rooms.

3. The Title IX officer or other designated central office district staff person will complete the certification form (attachment E-3) for this program component and attest that Steps 1 and 2 have been completed. The certification form will also include the district's plans for addressing areas of deficiencies identified during the analysis in Step 2. Once every five (5) years as part of the certification process, the comprehensive audit will be completed and a certification form signed by the superintendent attesting to the evaluation of facility use district-wide will be forwarded to the Kent Intermediate School District.

E-1

OK Conference Gender Equity Comprehensive Audit
Facilities
Team Worksheet

School _____

Sport _____

Level _____ Number of participants _____

Head Coach _____ ☐Female ☐Male

Person completing form, if different _____

Practice Facilities

1. What facilities does your team utilize for practice?

2. Is your practice facility shared with any other activities? Does it interfere with your team's utilization of that facility?

3. Is your practice facility adequately prepared and/or maintained?

4. Is your practice facility adequately equipped?

5. What is the overall quality of your practice facility (e.g., excellent, adequate, poor)? Please note any special problems with your practice facility.

Competitive Facilities

1. What facilities does your team utilize for competition?

2. Is the facility you utilize for competition shared with any other activities?

3. Is the facility you utilize for competition adequately prepared and/or maintained?

4. Is the facility you utilize for competition adequately equipped?

5. What is the overall quality of the facility you utilize for competition (e.g., excellent, adequate, poor)? Please note any special problems with your competitive facility.

Locker Rooms

1. What locker room does your team utilize? Are lockers individually assigned to your athletes? For what length of time are they assigned (e.g., all year, the length of season, daily use, etc.)?

2. Do your athletes have exclusive use of the locker room or are other teams or groups using the locker room at the same time (i.e. size of room, size of lockers)?

3. What is the quality of the locker room facilities (e.g., excellent, adequate, poor)? Please note any special problems with your locker room facility.

4. Are coaches' offices readily available/accessible to student athletes?

E-2

OK Conference Gender Equity Comprehensive Audit
Facilities
School/District Worksheet

On form E-1 the district gathered information from each team in the district using the team worksheets. Now use the district worksheet to compare the information from your schools about the facilities provided boys' and girls' teams throughout the district. To complete the certification form in the next and final step, you will need to make a number of judgments about the comparability of the treatment of the boys' and girls' teams.

It is essential in determining whether there is a disparity in this area that you consider both the number of girl and boys' teams affected and the actual number team participants affected. Because the number of participants on each team will vary greatly, simply comparing the number of girls' and boys' teams reporting problems will not give you a complete measure of whether the male and female athletes in the district are being treated equally as a whole.

The top of each team worksheet (E-1) should indicate the number of students participating on the team. You will need to use these numbers to conduct the calculations needed to answer some of the questions on the worksheet below.

Based on the information acquired from the different teams, carefully consider and answer the following questions for the district as a whole. Your objective is to arrive at a conclusion about whether, in the district athletic program as a whole, there are differences in the treatment of boys and girls.

Practice Facilities:

1. Is there an overall disparity between boys' and girls' teams regarding the need to share use of practice facilities with other teams or district activities (e.g., interscholastic, club, or intramural teams, pep band, etc.)?

2. Is there a disparity between boys' and girls' teams regarding whether the facilities are prepared and maintained adequately?

3. Is there a disparity between boys' and girls' teams regarding whether the facilities are properly equipped?

4. Is there a disparity in the number of boys' teams and girls' teams that report that their practice facilities are not of adequate quality?

Competitive Facilities:

1. Is there an overall disparity between boys' and girls' teams regarding the need to share use of competitive facilities with other district activities (e.g., interscholastic, club, or intramural teams, pep band, etc,)?

2. Is there a disparity between boys' and girls' teams regarding whether competitive facilities are appropriately equipped?

3. Is there a disparity in the number of boys' and girls' teams that report that their competitive facilities are not of adequate quality?

Locker Rooms:

1. Is there a disparity in the number of boys' and girls' teams that report that their locker room is not of adequate quality and availability?

Overall conclusion:

1. Overall, is there a disparity between the extent to which the district is meeting the needs of the boys' and girls' sports in the area of equipment and supplies?

2. For the disparities or differences that you identified in the questions above, have you found that there is a significantly greater percentage of boys or girls affected?

3. If there a disparity overall, can the disparity be explained by nondiscriminatory factors and, if so, what factors?

Action steps taken to address facility concerns:

E-3

OK Conference Gender Equity Comprehensive Audit
Facilities
Certification Form

This form is to be used by a school district to report to KISD the results of its self-evaluation of its athletic facilities (including practice and competitive facilities and locker rooms). This form should be completed by a representative group of individuals designated for that purpose by the superintendent. The completed forms should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

Note: In this context, "facility" means a playing field, stadium, court, gym, pool, etc. "Competitive events" means games, meets, or matches involving teams from one or more other schools.

		Yes	No
1.	Have you gathered information on the practice and competitive facilities and locker rooms for boys and girls' teams?	☐	☐
2.	Have you evaluated the availability, preparation, maintenance, and quality of the practice and competitive facilities and locker rooms provided for the boys' and girls' teams?	☐	☐
3.	Have you identified any disparity for comparable sports or overall between the practice and competitive facilities and locker rooms provided for boys and girls? Please explain.	☐	☐
4.	Are there any nondiscriminatory justifications for the disparity?	☐	☐

Action steps to address facility concerns:

_____ School District

_____ Board of Education Representative

_____ Title IX Coordinator

_____ Date

_____ Superintendent

Section F

OK Conference Gender Equity Comprehensive Audit
Publicity
Overview

In Section F – information will be gathered and verified regarding the publicity and promotion for girls' and boys' teams. While publicity and promotional activities vary from district to district, it is important to pay close attention to how much publicity or resources for promotion that girls' and boys' teams receive. Whatever limited resources are available for these activities must be distributed equitably.

Some examples of publicity and promotional activities included in this component include but are not limited to:

School-wide announcements
Cheerleaders support
Band support
Pep rallies or assemblies
Local media coverage
School newspaper articles
Poster and banner production

All of the above activities are significant because they help to develop programs, get students to try out for teams, and give the student-athletes a sense of worth. For these reasons it is important that the district ensure equitable support.

The measure of equality in this area is determined by the efforts of the school to provide equal publicity and promotion. Districts are not held responsible for inequities resulting from the efforts of outside media as long as the district makes equal efforts to obtain coverage. Districts should also attempt to offset any inequalities in this area which may result from the initiative of fans and individual teams' booster clubs. This being said, the unique circumstances of a particular team, competitive event or a particular athlete may create unique demands or imbalances in certain program components such as publicity. Such imbalances are permissible to the extent that they do not limit the opportunities for teams of the other sex.

In the following sections, the district will collect and analyze information on the support provided to each team for publicity and promotional activities in order to ensure that the resources are allocated equitably between girls' and boys' teams.

Checklist for gender equity comprehensive audit of coaching:

1. Collect needed information from each team using the attached form (F-1). The head coach of each team should complete the form with input, where appropriate, from assistant coaches and the players. Completed forms should be returned to the athletic director or Title IX officer for the district.

2. Based on the forms completed by all the coaches in a given district, the information should be compiled and analyzed (F-2) to assess whether female and male athletes, district wide, are being given equal opportunities regarding publicity and promotional activities.

3. The Title IX officer will complete the certification form (F-3) for the program component and attest that steps 1 & 2 above have been completed. This certification will include the district plans for addressing areas of deficiencies identified by the analysis in step 2. Once every five (5) years as part of the certification process, the comprehensive audit will be completed and a certification form signed by the superintendent attesting to the evaluation of publicity and promotional activities district wide, which will then be forwarded to the Kent Intermediate School District.

F-1

OK Conference Gender Equity Comprehensive Audit
Publicity
Coach Worksheet

School _____

Sport _____

Level _____ Number of participants _____

Your name _____ ☐Female ☐Male

1. Is anyone assigned for the publicity and promotion of your team to local media? If so, who? If no one is assigned, then who takes care of the publicity/promotion for your team?

2. Describe the qualifications and time spent by whoever handles these activities.

3. Does the quantity and quality of publicity and promotion for your team deny them equal treatment or opportunities? If yes, please explain.

4. What is your school's publicity and promotion for teams that move up the ladder during tournament competition?

5. Please check to show which of the following resources are available to your team:

   a. ☐ poster in the school
   b. ☐ banners in the gym
   c. ☐ lockers decorated
   d. ☐ pep assemblies
   e. ☐ articles in local newspaper
   f. ☐ articles in school paper/newsletter
   g. ☐ year book coverage
   h. ☐ pep band at contests
   i. ☐ cheerleaders at contests
   j. ☐ trophy cases
   k. ☐ radio or TV broadcasts
   l. ☐ daily school announcements
   m. ☐ programs
   n. ☐ dances, etc., coordination

Additional comments:

F-2

OK Conference Gender Equity Comprehensive Audit
Publicity
School/District Worksheet

On form (F-1) the district gathered information from each team coach on the publicity/promotion provided. Now use this school/district worksheet (F-2) to compile and evaluate the equity of the publicity and promotion resources available to the girls' and boys' teams.

It is essential in determining whether there is a disparity in publicity that you consider the number of girls' and boys' teams affected and the actual number of participants affected. The number of participants on each team may vary greatly; simply comparing the number of teams reporting problems will not give you a complete measure of whether female and male athletes in the district are being treated equally as a whole.

The top of each coach's worksheet (F-1) should indicate the number of participants on that particular team. You will need these numbers to conduct the calculations needed to answer some of the questions below.

Based on the coaching information gathered, carefully consider and answer the following questions for the district as a whole. Your objective is to determine whether, in the district wide athletic program as a whole, there are differences in the treatment of boys and girls in the area of publicity.

1. Do the forms reflect a disparity in the number of girls' or boys' teams with personnel assigned to take care of publicity or promotion of the teams?

2. Are the people who handle the publicity or promotion of the girls' and boys' teams equally qualified?

3. Is an equal amount of time spent in the publicity/promotion of both the girls' and the boys' teams?

4. Is there any pattern of girls' or boys' teams reporting that the amount of support that they receive may deny them equal treatment or opportunities?

5. Identify the % of girls' or boys' teams reporting the following publicity resources are available to them.

	Girls' %	Boys' %
a. poster in the school	_____	_____
b. banners in the gym	_____	_____
c. lockers decorated	_____	_____
d. pep assemblies	_____	_____
e. articles in local newspaper	_____	_____
f. articles in school paper/newsletter	_____	_____
g. year book coverage	_____	_____
h. pep band at contests	_____	_____
i. cheerleaders at contests	_____	_____
j trophy cases	_____	_____
k. radio or TV broadcasts	_____	_____
l. daily school announcements	_____	_____
m. programs	_____	_____
n. dances, etc., coordination	_____	_____

Overall conclusion: For each disparity you have identified above, including the percentage of resources available in number 5, have you found more girls' or boys' teams affected?

Action steps taken to address publicity:

F-3

OK Conference Gender Equity Comprehensive Audit
Publicity
Certification Form

This form is to be used by a school district to report to KISD the results of its self-evaluation of practices related to equal opportunities in publicity and promotion of girls' and boys' teams. This form should be completed by a representative group of individuals designated for that purpose by the superintendent. The completed forms should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

		Yes	No
1.	Have you gathered information on the amount of personnel assigned to the publicity and promotion of teams?	☐	☐
2.	Have you evaluated the training, experience and professional qualifications of those assigned to publicize and promote the teams?	☐	☐
3.	Does the information gathered and analyzed regarding publicity indicate that there is an overall disparity between publicity and promotion resources afforded to boys and girls? Explain.	☐	☐
4.	If there is a disparity, are there nondiscriminatory factors that explain the disparity? If yes, please explain.	☐	☐

Action steps taken to address publicity concerns:

School District

Board of Education Representative

Title IX Coordinator

Date

Superintendent

Section G

OK Conference Gender Equity Comprehensive Audit
Medical and Training Services
Overview

This component involves an assessment of whether the district's male and female athletes receive equal treatment in the area of medical and training services. In many districts these services will be minimal hut it is important to include consideration of this component in one's evaluation of equality. This consideration should determine, at a minimum, whether athletes of both sexes:

1. Have equal access to medical and emergency personnel and assistance;
2. Are covered by or offered the same type of accident insurance;
3. Are given comparable access to athletic trainers;
4. Have equal access to, and quality of, weight, conditioning and training facilities.

Checklist for gender equity comprehensive audit of medical and training services:

1. Collect information from each team, using form G-1 collect information from each team about the availability of medical and training staff and the training facilities provided. The team worksheets should ordinarily be completed by the head coach for each team with input, when appropriate, from team members.

2. Based on the forms (G-1) completed by all the coaches in a given district, the information should be compiled and analyzed (form G-2) to assess whether female and male athletes, district-wide are being given equal opportunities and access to medical and training facilities and staff.

3. The Title IX officer or superintendent will complete the certification form (G-3) for this program component and attest that steps 1 & 2 above have been completed. The certification form will include the district plans for addressing areas of deficiencies identified by the analysis in step 2. Once every five (5) years as part of the certification process, the comprehensive audit will be completed and a certification form signed by the superintendent attesting to the evaluation of medical and training opportunities district wide will be forwarded to the Intermediate School District.

G-1

OK Conference Gender Equity Comprehensive Audit
Medical and Training
Team Worksheet

School _____

Sport _____ Gender _____ Level _____

Your Name _____

Medical and Training Facilities
(Such as conditioning and weight room and training room facilities)

1. What training/weight rooms do your teams use?

2. Do athletes use the training rooms on a scheduled or drop-in basis? What is the schedule?

3. What is the quality of the training, weight and conditioning facilities?

4. Are there any problems with the scheduling or availability of the facilities?

5. Are the training facilities available for teams adequate?

Medical and Training Service

1. Are trainers provided for any events? If so, what events?

2. Do trainers work with a physician who works with your teams?

3. Is there a medical doctor available for home events?

4. Has any athlete ever had an injury requiring an examination or treatment by a doctor? If so, how were the doctor's services obtained?

5. Does the district provide medical and accident insurance for student athletes?

6. Are the training and medical services adequate?

Additional Comments:

G-2

OK Conference Gender Equity Comprehensive Audit
Medical and Training
School/District Worksheet

On form G-1, the district gathered information about each team in the district using the team worksheets. Now you can use the school/district worksheet (G-2) to compare the information from your schools about the medical and training facilities and services provided to boys' and girls' team throughout the district.

It is essential in determining whether there is a disparity in this area that you consider both the number of girls' and boys' team affected and the actual number of participants affected. The number of participants on each team may vary greatly; simply comparing the number of teams reporting problems will not give you a complete measure of whether female and male athletes in the district are being treated equally as a whole.

The top of each team worksheet should indicate the number of students participating on the teams. You will need to use these numbers to conduct the calculators needed to answer the final question on the worksheet below.

Based on the information acquired from the different teams, carefully consider and answer the following questions for the district as a whole. Your objective is to arrive at a conclusion about whether, in the district athletic program as a whole; there are differences in the treatment of boys and girls.

1. Is there a difference overall in the access of girls' and boys' sports teams with respect to access to training facilities?

2. Is there a disparity in the number of boys' teams and girls' teams that report that their training facilities are not adequate?

3. Overall, is there a disparity between the extent to which the district is meeting the needs of the girls' and boys' program in the area of training facilities?

4. If there is a disparity overall, can the disparity be explained by nondiscriminatory factors and, if so, what factors? (For example, do unique aspects of particular sports account for the disparity?)

5. Overall, is there a disparity in meeting the needs of the girls' and boys' programs in the area of health, accident and injury insurance?

6. Overall, is there a disparity between the extent to which the district is meeting the needs of the girls' and boys' programs in the area of medical services?

7. If there is a disparity overall, can the disparity be explained by nondiscriminatory factors and, if so, what factors? (For example, do unique aspects of particular sports account for the disparity?)

8. For the disparities or differences that you identified in the questions above, have you found that there is a significantly greater percentage of girls or boys affected?

9. If there is a disparity overall, can the disparity be explained by nondiscriminatory factors and, if so, what factors? (For example, do unique aspects of particular sports account for the disparity?)

Summary Determination:

Action steps to address medical and training:

G-3

OK Conference Gender Equity Comprehensive Audit
Medical and Training Services
Certification Form

This form is to be used by a school district to report to the KISD the results of its self-evaluation of its provision of medical and training services and facilities. This form should be completed by a representative group of individuals designated for that purpose by the superintendent. The completed form should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

		Yes	No
1.	Have you evaluated whether the girls' and boys' athletic programs are provided with medical and training services on an equivalent basis?	☐	☐
2.	Did the evaluation include a survey of the medical and training facilities and services regularly provided to each girls' and boys' team?	☐	☐
3.	Did you compare the availability of medical services at girls' and boys' competitions?	☐	☐
4.	Did you consider whether girl and boy athletes have equal access to medical and accidental insurance?	☐	☐
5.	If there are disparities, who do they favor overall?		
	a. The boys' teams and a high percentage of boys?	☐	☐
	b. The girls' team and a high percentage of girls?	☐	☐
6.	If there is an overall disparity favoring boys or girls, are the medical and training facilities and services nonetheless equally meeting the needs of the athletes taking into account the nature of the athletic activities involved? (If yes, explain in the space below.)	☐	☐

7. Action steps to address disparities in medical and training services:

School District	Board of Education Representative
Title IX Coordinator	Date
Superintendent	

Section H

OK Conference Gender Equity Comprehensive Audit
Travel
Overview

In Section H – information will be gathered and verified regarding the travel and per diem for girls' and boys' teams. Five main areas are evaluated:

1. Modes of transportation
   a. Compare types of transportation used when traveling similar distances.
   b. Some reasons for differences could be the number of athletes traveling to a contest or the amount or type of equipment being transported.

2. Overnight accommodations when necessary during travel
   a. If accommodations are necessary then:
      1) The quality of the accommodations should be examined.
      2) The number of athletes assigned to share a room should be examined.

3. Length of stay before and after contests
   a. Are boys and girls teams provided comparable opportunities to arrive at away games with time to rest, have meals or practice?

4. Per diem allowances
   a. When necessary (for the team to eat) the amount of money spent per athlete per meal should be the same for boys and girls.

5. Dining arrangements when made by the school should for both boys and girls:
   a. Consider the convenience of the restaurant to the competition facility.
   b. Consider the quality of the restaurant.

While some schools may not provide all of these travel services for their teams, whatever services are provided must be provided equitably between the girls' and boys' program. This does not mean that the travel arrangements for each team must be identical. The law recognizes that many factors may affect the travel needs of any particular team for any particular event. However, these services must be provided in a way that equally meets the overall needs of the boys' and girls' teams. Generally, a school must determine whether there is a pattern of favoring teams of one sex in the provision of travel services.

H-1

OK Conference Gender Equity Comprehensive Audit
Travel and Per Diem
Team Worksheet

School _____

Sport _____

Level _____ Number of participants _____

Head Coach _____ ☐Female ☐Male

Person completing form, if different _____

Circle (or place check mark) as applicable:

☐Head Coach ☐Assistant Coach ☐Volunteer Coach ☐Faculty ☐Non Faculty

1. What mode of transportation is usually used to transport the team to away events?

2. Does the team ever use transportation other than indicated above? If so, why?

3. When overnight accommodations are necessary, how many athletes share a room?

4. Who pays for the team's meals while traveling?

5. If the school district pays, how much money per meal is allotted for each athlete?

6. Do you feel that the team's travel arrangements provide an adequate amount of time at the away site before and after competitions?

7. Overall, are the travel arrangements for the team adequate to meet the needs of the team? If not please explain.

8. Do you feel that the travel arrangements for the team are comparable to other teams with similar travel needs? If not, please explain.

9. Has your team been denied any opportunities as a result of a lack of travel funds?

Additional comments:

H-2

OK Conference Gender Equity Comprehensive Audit
Travel and Per Diem
School/District Worksheet

On form H-1, the district gathered information about each team in the district using the team worksheets. Now use this district worksheet to compare the information from your schools about the travel and per diem provided to boys' and girl' team throughout the district. To complete the certification form in the next and final step, a number of judgments about the comparability of the treatment of boys and girls, will need to be made.

It is essential in determining whether there is a disparity in coaching that you consider the number of girls' and boys' teams affected and the actual number of participants affected. The number of participants on each team may vary greatly; simply comparing the number of teams reporting problems will not give you a complete measure of whether female and male athletes in the district are being treated equally as a whole.

The top of each team worksheet (H-2) should indicate the number of participants on that particular team. You will need these numbers to conduct the calculations needed to answer some of the questions below.

Based on the information acquired from the different teams, carefully consider and answer the following questions for the district as a whole. The objective is to arrive at a conclusion about whether, in the district athletics program as a whole, there are differences in the treatment of boys and girls.

1. Do the forms reflect that boys' and girls' teams are provided an equivalent type of transportation, such as, school bus, new or old vans, private cars, etc.?

2. If there is a difference overall between the types of transportation provided to boys' and girls' teams, what may account for the difference?

3. If the district provides overnight accommodations for away events, are the boys' and girls' teams provided equivalent quality of accommodations?

4. If the district provides overnight accommodations for away events, are the number of athletes assigned to each room equivalent for boys and girls?

5. Do the forms reflect an overall disparity between the amount of money allotted per meal for female and male athletes?

6. Is there a disparity between the number of girls' and boys' coaches who indicate that the amount of time at the away venue before and after competitions is inadequate?

7. Is there a disparity between the number of girls' and boys' coaches who indicate that, overall, the travel arrangements for their team are inadequate?

8. Is there a disparity between the number of girls' and boys' coaches who indicate that the travel arrangements for their team are not comparable to other teams with similar travel needs?

9. Is there a disparity between the number of girls' and boys' coaches who indicate that their team has been denied opportunities as a result of a lack of travel funds?

10. For the disparities or differences that are identified in the questions above, have you found that there is a significantly greater percentage of girls or boys affected?

Overall conclusion:

Action steps taken to address Travel and Per Diem:

H-3

OK Conference Gender Equity Comprehensive Audit
Travel and Per Diem
School/District Worksheet

This form is to be used by a school district to report to KISD the results of its self-evaluation of practices related to equal opportunities to receive Travel and Per Diem. This form should be completed by a representative group of individuals designated for that purpose by the superintendent. The completed forms should be signed by the superintendent and submitted with the accompanying certification worksheets for each of the other program components to:

Ron Koehler
Assistant Superintendent
Kent ISD
2930 Knapp Street, NE
Grand Rapids, MI 49525

		Yes	No
1.	Have you gathered information on the travel and per diem arrangements provided to the boys' and girls' teams?	☐	☐
2.	Have you evaluated the modes of transportation, overnight accommodations furnished during travel, length of stay before and after competitive events, per diem allowances and dining arrangements?	☐	☐
3.	Does the information gathered and analyzed regarding travel and per diem indicate that there is an overall disparity between the travel and per diem afforded to boys' and girls'? Please explain:	☐	☐
4.	If there is a disparity, are there nondiscriminatory factors that explain the disparity? If yes, please explain.	☐	☐

Action steps taken to address Disparities in Travel and Per Diem:

School District

Board of Education Representative

Title IX Coordinator

Date

Superintendent