

Title IX Gender Equity in Athletics Audit

2021-22

Stephanie Griffin, Title IX Compliance
Bradley Smet, Director of Athletics
School Board 5.25.2022

Headlines

Participation Gap violation

Propose adding 1-2 women's teams

Need to address some benefit disparities

Adjustments in monitoring for future

Topics

1

Who/What/Where/How

Task force objectives, members, methodology

2

Findings

Participation gap, benefit analysis contingent

3

**Recommendations /
Actions**

Add sand volleyball, initiate field hockey, internal development of other sports, benefits

What is Title IX?

"No person in the United States shall, on the basis of sex,
be excluded from the participation in,
be denied the benefits of,
or be subjected to discrimination,
under any educational program or activity receiving federal financial
assistance"

50th Anniversary of Title IX

June 23, 2022 marks the 50th anniversary of Title IX which has increased the number of girls in high school athletics ten-fold!

There are activities planned for next year by a local committee focused on bringing awareness about this legislation which is considered by many to be the most important law for equal rights for women after the 1918 right to vote.

Why engage with Title IX/Gender Equity?

- 50th Anniversary
- New Title IX Compliance Officer
- District equity plans
- New(ish) Athletic Director
- Turn-over of Athletic Directors and institutional knowledge
- History of Title IX questions from parents and students
- Review of (incomplete) historical data indicates disparity

Gender Equity Review of Athletics

Step 1 - How are we doing under Title IX and our own goal of gender equity?

Step 2 - If there are gender based inequities across the program, how can we rectify them?

Step 3 - How to we institutionalize this work so that equity becomes the norm in our athletics program?

Taskforce Participants

Bree DeYoung
 Finn Burke
 Nico Caputo
 Kim DeYoung
 Chris Hart
 Molly Lloyd
 Stephanie Griffin
 Bradley Smet
 Adam Littlefield/Erin Igoe
 Patty Johnston
 Brain Killgore
 Jefferson White
 Jeanine Bourcier Holmlund
 Liam Kelly
 Eva Phalen
 Donna Lopiano

Student	Parent	Staff	Coach	Other
x				PAC Rep
x				PAC Rep
x				TPH
	x			PAC Rep
	x			Boosters
	x			T9 Committee
	x	x		
		x		
		x		
		x		
		x		
			x	
				PRD
				PRD
				consultant

Guidance from Dr. Donna Lopiano

- CEO of the *Women's Sports Foundation* (1992-2007)
- Named one of “*The 10 Most Powerful Women in Sports*” by Fox Sports.
- Recognized gender equity leader by the *International Olympic Committee*, the *National Collegiate Athletic Association*, the *National Association for Girls and Women in Sports*, the *National Association of Collegiate Women Athletic Administrators* and the *National Association of Collegiate Directors of Athletics*.
- *University of Texas at Austin* Director of Women's Athletics for 18 years
- Past-president of the *Association for Intercollegiate Athletics for Women*.
- Testified about Title IX and gender equity before three *Congressional* committees,
- Consultant to the *U.S. Office for Civil Rights Department Title IX Task Force*



Title IX Athletics Compliance Review

Finding Area 1 - Participation and Accommodation of Interests

- 3-prong test

Finding Area 2 - Athletic Scholarships

- Not applicable

Finding Area 3 - Athletic Benefits (Laundry List)

- Equipment and Supplies
- Scheduling
- Travel
- Tutoring
- Coaching
- Facilities
- Medical Services
- Housing/Dining
- Publicity
- Administrative Services

Athletics: What is Required

Overall equal athletics opportunity and benefits for members of each gender

- "Equal" = equivalent or equal in effect
- The overall effect of any difference or disparity must be "negligible"

Athletics: What is *NOT* Required

- "Identical benefits, opportunities or treatment"
- "The same benefits provided for male and female teams in the same sports"
- Male and female programs to be "mirror images" of each other
- Cutting or reducing teams to reach proportionality - heavily disfavored by the federal Office for Civil Rights that enforces Title IX

Ten Important Methodology Rules

1. Each sport examined SEPARATELY not in comparison
2. Program then analyzed as a whole.
3. Analysis in the most recent year in which all data is available
4. All female athletes compared to all male athletes
 - a. Never count sports – always participants
 - b. Never compare 1 sport to 1 sport
5. Fact-based data only – not opinion

Ten Methodology Rules continued

6. No consideration of where money comes from – institution obligated to ensure \$ from all sources expended in a manner that treats M & W with equity
7. Lack of financial resources is not a justification for different treatment or failure to remedy inequities
8. Athletes/coaches cannot choose to accept discriminatory treatment (“my basketball coaches got together and agreed on late vs. early practice times”)

Ten Methodology Rules continued again

9. It's acceptable to have different treatment based on gender neutral factors – ie bus use based on team size or distance to be traveled – objective standard equally applied to men's and women's teams
10. OK to treat some sports better than others as long as equal proportions of participants receive the same better (or worse) treatment

What Title IX Means to Schools

Title IX requires schools to:

Participation &
Interest Survey

- Offer male and female students nondiscriminatory opportunities to play sports, and

Benefit
"Laundry List"
Analysis

- Treat male and female students athletes fairly, offering female students the same treatments and benefits offered male athletes

Methodology

1. Collect participation from rosters, compare to enrollment at school

a. 51.2% boys enrolled, 48.8% girls enrolled

2. Conduct an interest survey and review results

a. Are we accommodating the interests of students?

3. Review methodology to evaluate benefits and treatments

a. Coaches ratings based of quality based on standardized definitions

4. Compile data collected from coaches benefits and treatments ratings

a. Analyze ratings based on proportions of girls and boys experiencing the benefit/treatment

b. Are there disparities in areas?

Task Force Meetings

February 17, 2021

- What is Title IX?
- Preliminary Participation Data and Discussion
- Sample Interest Survey

March 17, 2022

- Participation Data
- Interest Survey Data and Discussion
- Review Benefit "Laundry List" Methodology

April 21, 2022

- Benefit "Laundry List" Data and Discussion
- Preliminary Findings and Remedies

May 24, 2022

- Benefit "Laundry List" Data and Discussion
- More Preliminary Findings and Remedies

Findings

Participation Finding

SUMMARY	Male	Female
Total # Students in this school	446	425
% Students	51.2%	48.8%

Participation Gap Elimination Options

Add girls teams

Add girls levels (JV, frosh)

Increase rosters on girls' teams

Decrease rosters on boys' teams

Remove boys' team

Interest Survey

The district administered an athletic interest survey to all students 6th-12th to determine in what sports students might be interested.

If you didn't play sports this year, why?



Interest Survey

What other sports might you be interested in?



Participation Gap Elimination Plan

Action	Sport	Level	Timeline
Add new sport	G Beach Volleyball	Varsity & JV	Spring 2023
Add new level	G Lacrosse	Frosh	Spring 2023
Increase turn-out / rosters	All girls sports*		2022-23
Add new sport*	TBD	Varsity	2023-24

Participation Gap Elimination Plan Details

WORKSHEET A: PLANNED SPORT PARTICIPATION 2022-2023, Fall 2023

PARTICIPATION SOLUTION (1) Add Girls' Varsity Beach Volleyball (2) Add Girls' JV Beach Volleyball (3) Add Girls' Frosh Lacrosse (4) Add Girls' Frosh Water Polo (5) Add Competitive Cheer (6) Increase Girls' Varsity Basketball (5) Increase Girls JV Basketball (6) Increase Girls JV Softball addl options (7)

PRONG ONE TITLE IX COMPLIANCE Overall - percent of male and female athletes must be equal to percent boys and girls in student body. Within each competition level (Varsity/JV/Frosh), the percent of male and female athletes should be equal.	GAP CALCULATION	
	PROPOSED CUT (None)	
	PROPOSED NEW	
	PROPOSED GROWTH	
	EXISTING SPORT	
SUMMARY	Male	Female
Total # Athletes (Varsity/JV/Fr)	414	395
% Athletes	51.2%	48.8%
Total # Students in this school	446	425
% Students	51.2%	48.8%
OVERALL FEMALE PARTICIPATION GAP		0

Participation Gap Elimination Plan Details

VARSITY SPORTS	Male	Female
Badminton	17	23
Baseball	16	0
Basketball	14	12
Cross-Country	12	9
Football	21	1
Golf	6	6
Lacrosse	20	21
Beach Volleyball	0	8
Soccer	21	21
Softball	0	14
Swimming	21	24
Tennis	16	16
Track and Field	23	15
Volleyball	12	13
Waterpolo	15	14
2023-24 TBD (groundwork for Field Hockey)	0	14
Cheer (non CIF-not included in Team totals)	0	6
TOTAL	214	211
% of Athletes by Gender in this Level of Competition	51.7%	53.4%

Participation Gap Elimination Plan Details

JUNIOR VARSITY SPORTS	Male	Female
Baseball	14	0
Basketball	10	12
Cross-Country	16	10
Football	30	0
Lacrosse	15	24
Beach Volleyball	0	8
Soccer	20	17
Tennis	11	16
Track and Field	23	8
Volleyball	11	12
Waterpolo	14	16
Swimming	3	6
Softball		12
TOTAL	167	141
% of Athletes by Gender in this Level of Competition	40.3%	35.7%

Participation Gap Elimination Plan Details

FROSH SPORTS	Male	Female
Basketball	17	0
Soccer	16	17
Volleyball	0	12
Lacrosse Spring 2023	0	14
TOTAL	33	43
% of Athletes by Gender in this Level of Competition	8.0%	10.9%

Participation Gap Elimination Plan

Action	Sport	Level	Timeline
Add new sport	G Beach Volleyball	Varsity & JV	Spring 2023
Add new level	G Lacrosse	Frosh	Spring 2023
Increase turn-out / rosters	All girls sports*		2022-23
Add new sport*	TBD	Varsity	2023-24

Preliminary Findings of Benefits and Treatment

OTHER ATHLETIC BENEFITS AND OPPORTUNITIES				
Program Component	Advantage To:			
	B --- boys			
	G --- girls			
OK --- neither				
INC -- Incomplete				
V	JV	FR		
Competition Schedule	B	B	B	54 areas reviewed by level
Equipment and Supplies	OK	OK	B	
Uniforms*	G	B	B	
Practice Contest Times	B	B	B	
Practice Facilities	OK	B	B	
Competition Facilities	OK	OK	OK	
Locker Rooms*	OK	OK	OK	16/54 advantage boys
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK	
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK	
Coach Quality /Years Experience (preliminary)	INC	INC	INC	
Coach Employment Status	B	OK	OK	
Travel - Meals	OK	B	OK	
MD, Trainers	OK	OK	OK	1/54 advantage girls
Spectator Accommodations	OK	OK	OK	
Training and Weight Training Facilities	B	B	OK	
Publicity/Promotion	B	OK	OK	
Awards/Recognition	OK	OK	OK	
Administrative Support Services (preliminary)	OK	OK	OK	

Preliminary Findings of Benefits and Treatment

COMPETITION APPAREL REPLACEMENT (Superior = new apparel provided annually; Adequate = new competition apparel provided on a varying year schedule that treats men's and women's teams equally or -replacing some components annually; Inadequate = inadequate replacement schedule)

SUITABILITY OF COMPETITION APPAREL (Superior = sport-specific custom apparel and shoes; Adequate = generic gear; Inadequate = not provided)

QUALITY OF COMPETITION APPAREL (Superior = top quality, wicking, custom; Adequate = good quality; Inadequate = not provided or poor quality)

Preliminary Findings of Benefits and Treatment

OTHER ATHLETIC BENEFITS AND OPPORTUNITIES				
Program Component	Advantage To:			
	B --- boys			
	G --- girls			
OK --- neither				
INC -- Incomplete				
V	JV	FR		
Competition Schedule	B	B	B	54 areas reviewed by level
Equipment and Supplies	OK	OK	B	
Uniforms*	G	B	B	
Practice Contest Times	B	B	B	
Practice Facilities	OK	B	B	
Competition Facilities	OK	OK	OK	
Locker Rooms*	OK	OK	OK	16/54 advantage boys
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK	
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK	
Coach Quality /Years Experience (preliminary)	INC	INC	INC	
Coach Employment Status	B	OK	OK	
Travel - Meals	OK	B	OK	
MD, Trainers	OK	OK	OK	1/54 advantage girls
Spectator Accommodations	OK	OK	OK	
Training and Weight Training Facilities	B	B	OK	
Publicity/Promotion	B	OK	OK	
Awards/Recognition	OK	OK	OK	
Administrative Support Services (preliminary)	OK	OK	OK	

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

Girls program, on average, are not making as full use of competition opportunities as boys teams.

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

Additional equipment and equipment storage is being identified with the coaches and AD for next year. Proposed add balls and ball carts.

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

New uniforms
for Girls JV
Soccer and
Girls JV
Volleyball next
year per
Uniform
Rotation plan

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

-AD will review practice schedules to determine any inequities in practice time pre-season.

- AD will work with basketball and volleyball team to provide equitable access for off-season access

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

-Some girls sports have been displaced to Morrison when other school activities were scheduled. Going forward policies well be maintained to not displace

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

Asterisk as evaluation tool did not capture local context well.
Rating definitions to be updated.

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

-More coaches of boys sports are employed elsewhere in the district. AD and District will investigate ways to incentivize employee status and recruitment.

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

-The Girls JV experience is lacking in overnight travel experience. AD will work with coaches to provide an equitable opportunity for travel in 2022-23.

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

-The girls program does not have equitable access to, and support in, weight training opportunities. A Weight Training coach has been budgeted for 2022-23 to provide equitable experiences.

Benefits and Treatment Remedies

Program Component	V	JV	FR
Competition Schedule	B	B	B
Equipment and Supplies	OK	OK	B
Uniforms*	G	B	B
Practice Contest Times	B	B	B
Practice Facilities	OK	B	B
Competition Facilities	OK	OK	OK
Locker Rooms*	OK	OK	OK
Coach - Athlete Instructional FTE Ratios (preliminary)	OK	OK	OK
Coach - Athlete Instructional Total Ratios (preliminary)	OK	OK	OK
Coach Quality /Years Experience (preliminary)	INC	INC	INC
Coach Employment Status	B	OK	OK
Travel - Meals	OK	B	OK
MD, Trainers	OK	OK	OK
Spectator Accommodations	OK	OK	OK
Training and Weight Training Facilities	B	B	OK
Publicity/Promotion	B	OK	OK

-The Athletic Department will now manage all base publicity for all teams including team posters, senior posters, team media guides and programs.

-Dir of Comm will assist with local publicity and social media channels.

Monitoring and Reporting Timeline

Summer/Fall:

1. Definitions for benefit rating will be updated

Ongoing

2. Coaches will annually review their program using the updated rating sheet
3. Team captains from each team will complete a program rating for their team
4. Participation numbers in audit format posted to the school website
5. Title IX Compliance Officer will review annual participation and benefit/treatment data and report to the school board annually.
6. Conduct a student interest survey every three years

Fall:

7. Status of remediations will be reported to the Title IX Task Force by October 1 by the Director of Athletics.

Participation Gap Plan

Adding Beach Volleyball, new levels of Lacrosse and Water Polo and TBD varsity sport



Benefit Inequity Plan

Address disparities identified in baseline Benefit Analysis



Monitoring and Reporting Plan

Annual benefit rating (coaches & captains), posting participation analysis, reports to board

Equity Methodology

- Examine separately, analyze the whole, don't compare team to team, focus on benefits not the money, address what is not negligible.
- Improve benefit analysis with new definitions, annual collection, student participation.

Title IX / Equity Concerns?

Director of Athletics

Principal

Speak Up (<http://bit.ly/highlanderhotline>) and in footer of district and PHS websites

Title IX Compliance Officer (titleix@piedmont.k12.ca.us)

Uniform Complaint Form (website under Forms and Documents, and under Non-Discrimination Policy)

Office for Civil Rights (contact info in Non-Discrimination Policy)

Questions and Feedback?

