



Title IX Audit Summary

Human Resources

Title IX



This is the Title IX Audit Summary prepared by Clark Hill PLC.

Documentation



- General Overview of GISD Student Numbers and Athletic Participation by Gender
- GISD Athletic Administration General Information
- GISD Booster Club information
- GISD 2023-2024 Student Handbook
- GISD 2023-2024 Athletic Training Guidelines & Procedures
- GISD 2023-2024 Student Code of Conduct
- GISD Title IX Grievance Policy and General Forms
- GISD 2023-2024 Greenville Lions Athletic Manual
- Certain GISD Policies related to Title IX, Student Welfare, Student Discipline, Employee Welfare, Student Rights and Responsibilities and Equal Education Opportunity
- GISD Communication documents related to sports programs/student-athletes.
- Telephone conference with Coach Sickels, Coach Collins, and Heath Jarvis
- Site visit with Coach Sickels, Coach Collins, and Attorney Steven F. Stapleton

Accommodation of Interests and Abilities



This area analyzes the general efforts by GISD to achieve Title IX compliance in its athletic offerings.

- GISD tracks the numbers of student-athletes in athletic department
- GISD offers a variety of programs for student-athletes, both male and female and participation is steady in most sports
- 2023-2024 Athletic Manual is an “excellent work product”
 - Sets forth the expectations for a coach, from the district, athletic department, player and parent perspective
- The 2024-2025 Athletic Manual will be revised to have a written “cut” or tryout policy
- The attorney recommends the district require all head coaches provide a written tryout procedure to athletes/parents and that these procedures are reasonable, and in compliance with Title IX and other District Policies
- The new Athletic Manual will be provided to all parent/legal guardian
- The attorney recommends the District continue to self-monitor and conduct a survey to further evaluate our efforts to provide substantially proportionate opportunities to its student-athletes

Coaches



This area analyzes GISD's qualification requirements, hiring, training, and coach offerings relative to its sports teams to ensure it is gender neutral.

- GISD has a consistent qualification criteria and consistent criteria when hiring coaches for both girls and boys' teams and equivalent compensation.
- Recognizes that there are more coaches in male sports and that this is due to the large numbers in football
- The GISD Athletic website is relatively up to date and identifies the coach (head and assistants) for the sports that are offered.

Equipment and Supplies



The goal is to ensure that regardless of gender or team, the students should be supplied with equal caliber equipment. The cost of equipment will vary by sport, but the quality of the equipment and supplies should be equivalent. A booster club purchasing equipment and supplies is part of the “school” and must be taken into account to determine compliance.

- Athletic budget appears to strive to provide equal opportunities from a financial perspective to both male and female teams
- Largest budget for equipment/supplies is set aside for the football program because of the numbers.
- The GHS agreement with Nike for discounts for new Varsity uniforms and footwear appears to be gender neutral and without a team specific component

Athletic Booster Club



It is important to stress that under Title IX, funds directed to athletic programs, whether provided by a booster club or outside donors become public funds once accepted by the District and those funds are subject to Title IX obligations.

- This is an area the athletic department intends to focus on from a Title IX compliance standpoint
- The athletic department intends to draft a written manual setting forth the roles and responsibilities of the booster club and its members.
- It will include a coaching education component.
- This manual will help the athletic department eliminate instances of donations coming to the athletic department that either are not approved or not in compliance with Title IX regulations

Locker Rooms, Practice and Competitive Facilities



Information provided demonstrates that GISD provides comparable facilities on an equivalent basis for both practice and game competition. This will help monitor for potential Title IX issues.

- Recommend that the AD prepare/revise an asset management plan that identifies:
 - the practice/game facilities
 - attendant equipment/storage capabilities
 - note areas of improvement that are either in-progress or planned
- The virtual site visit was productive and confirmed that the facilities, for the most part, are:
 - older and in need of improvements on a general scale
 - this would benefit both male and female sports offerings

Medical and Training Facilities and Services



Documents reviewed show that there is one (1) training room at the High School and one (1) training room at the indoor facility.

- Facilities are widely used and do not seem to be limited to any particular team or gender
- It appears that GISD provides medical and training services to all student athletes in need of such services, in a gender-neutral manner

Publicity



Some districts provide sports information and media services to its athletic teams. This is an area that is often overlooked by high school athletic programs.

- GISD Athletic website promotes both boys and girls team accomplishments.
- However, the website is out of date in certain areas and it is recommended that the District monitors the website's activity to ensure it contains accurate and current information.
- Continue to publish news and accolades regarding its athletic teams in a non-discriminatory fashion

Scheduling/Travel and Per Diem



Scheduling:

It appears GISD maintains non-discriminatory practices in establishing competitive game and practice schedules for both boys' and girls' teams for pre-season, in-season, and postseason competition

Travel and Per Diem

The goal is to ensure that regardless of gender or team, that the students should receive equal transportation, time to warm-up and pre/post-game meals.

- Various documents demonstrate GISD's goal of providing equal travel and per diem resources to boys' and girls' teams.
- Athletic Administration should review booster club resources to ensure that all teams receive substantially the same resources.

Recommendations for Next Steps



- Overall, GISD provided significant documentation to demonstrate its commitment to providing gender neutral athletic opportunities to its student-athletes.
- Site inspection was productive. The AD and AAD are consistently monitoring the athletic program with Title IX obligations in mind
- Exciting administrative improvements planned that will enhance the monitoring efforts
 - * tracking of participants in a more consolidated manner, revision of Athletic Manual and preparation of manual directed to the booster club
- Should continue its efforts to self-monitor and conduct a survey with its stakeholders to evaluate to provide substantially proportionate opportunities to its student-athletes
- Prepare/revise an asset management plan that identifies the practice/game facilities and attendant equipment/storage capabilities and note areas of facilities improvement that are either in-progress or planned. This will help monitor for potential Title IX issues when improvements are planned for a particular sport.
- In the event that the proposed changes to the Title IX regulations are made effective, the GISD will need to revisit its plans to ensure compliance with the new regulations, if necessary.



Questions?