

**KHSAA TITLE IX
ANNUAL REPORT SUBMISSION
STATUS REPORT
2008-2009**

KHSAA
Form T65
Revised 4/09

TO: KHSAA Member School Superintendents, Principals, and Athletic Directors

FROM: Brigid L. DeVries, Commissioner
Darren Bilberry, Assistant Commissioner

DATE: June 1, 2009

School	Spencer County High School	Reviewed by	Martha Mullins
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The following is a status report regarding the required 2008 - 2009 Title IX Annual Report submission of forms due into the KHSAA office by April 15, 2009. Appropriate KHSAA Audit Team personnel have reviewed these forms and the following is a summary of this review.

I. Checklist of Forms properly submitted in a satisfactory manner:

	GE 19 (Annual Verification)	X	T-35 (Budget Expenses)
	T-1 (Summary Program Chart 1)	X	T-36 (Budget Expenses)
	T-2 (Summary Program Chart 2)	X	T-41 (Checklist – Overall Interscholastic Program)
X	T-3 (Summary Program Chart 3)	X	T-60 (Corrective Action Plan)
	T-4 (Summary Program Chart 4)	N/A	T-63 (Interscholastic Survey Results)

II. Status

A.		2008 – 2009 Forms are satisfactory and no further information or action is necessary at this time.
B.	X	Errors have been noted with respect to the following forms: <u>T-1 and T-2/T-4: Numbers on T-1 did not coincide with numbers on T-2/T-4. Please resubmit all three forms, by June 15, 2009 to permit the report to be finalized.</u> <u>T-60: Resubmit an edited form to clarify actions that have been taken and those that will be taken, by June 15, 2009.</u>
C.		The following forms were omitted and must be submitted by school representatives:
D.	X	According to the 2008-2009 data, the school appears to be meeting the standards established in: <input type="checkbox"/> Test 1 (Athletic participation is proportionate to enrollment) <input type="checkbox"/> Test 2 (History and continuing practice of program expansion) <input checked="" type="checkbox"/> Test 3 (Full and effective accommodation of interests and abilities)
E.		Other Recommendation and Comments: Imbalances noted in expenditures for EQUIPMENT/SUPPLIES and TRAVEL <u>strongly</u> indicate the need for policy to better assure gender equity and central oversight. School personnel are requested to forward copies of policy guiding the athletics program in these areas, and others as they see fit, for review and evaluation; by January 1, 2010.

) 27

) Revised 6/1/09



KENTUCKY HIGH SCHOOL ATHLETIC ASSOCIATION
2008-2009 ANNUAL VERIFICATION OF TITLE IX PROCEDURES
 (To be submitted by April 15, 2009 along with other required forms)

KHSAA Form GE19
 F:Forms/GE19
 Rev.12/05

APR 17 2009

The Spencer County High School, Taylorsville, Kentucky
 (Name of High School) (City)

certifies to the Kentucky High School Athletic Association that the following is an accurate and true representation of the facts surrounding compliance with 20 U.S.C. Sections 1681-1688, et. Seq. (also known as Title IX)

I certify the following provisions in accordance with records at the school contained in the permanent Title IX file, at least one copy of which must be maintained in the Principal's office, and to the best of my knowledge have completed the following tasks.

Established a gender equity committee at the high school. (List committee personnel and provide attachment if necessary)

Name	Address	Phone	Title
(Supt., Principal, Student, Parent, Coach, Etc.)			
Brian Higdon	520 Taylorsville Rd.	502 477 3255	Assistant Principal / Athletic Director
Wes Napper	520 Taylorsville Rd.	502 477 3255	Coach / Assistant Athletic Director
Korey Hartman	520 Taylorsville Rd.	502 477 3255	student
Mackenzie Smith	520 Taylorsville Rd.	502 477 3255	student
Clark Teague	520 Taylorsville Rd.	502 477 3255	Cross Track Coach
Matt Powenski	520 Taylorsville Rd.	502 477 3255	Football Coach
Paul Hartman	1275 Lakeside Dr	40071 502 477 2180	Parent

Scheduled a minimum of three meetings during the 2008-2009 school year on the following dates:

November 11, 2008
March 24, 2009
May 7, 2009

Designated the following person(s) as the Title IX coordinator for the school:

Name	Title	Address	Phone
Wes Napper	Assistant Athletic Director	520 Taylorsville Rd	502 477 3255

Designated the following person(s) as the Title IX coordinator for the district:

Name	Title	Address	Phone
Brian Higdon	Athletic Director	520 Taylorsville Rd.	502 477 3255

School personnel are continuing to make periodic reviews of the boys' and girls' athletics program reflected in the Corrective Action Plan.

In addition to the above information, the above referenced school maintains a complete permanent file relative to Title IX records including copies of the self-assessment audit, all corrective action plans, and other related materials.

Principal's Signature

4/15 20 09
 Date

Superintendent Signature

 School Board Chairpersons' Signature

(Send original copy to KHSAA - Maintain duplicate in Title IX school folder)

**2008-2009
ACCOMMODATION OF INTERESTS AND ABILITIES
SUMMARY PROGRAM CHART 1**

Participation Opportunities Test One					
	(Column 1)	(Column 2)	(Column 3)	(Column 4)	
	Program	Enrollment	Percentage of Total Enrollment	Number of Interscholastic Participants (double and triple count)	Percentage of Total Participation
Row 1	GIRLS	403	51%	124	43%
Row 2	BOYS	386	49%	165	57%
Row 3	Totals	789	100%	289	100%

*Number of 8th grade students & below used in Column 3 and Column 4 calculations: 13

Instructions:

- Determine the total number of girls enrolled, (place in Row 1, Column 1). Determine the total number of boys enrolled, (place in Row 2, Column 1).
- Add the total number of girls and boys enrolled to determine total enrollment, (place in Row 3, Column 1).
- Calculate the percentage of total enrollment that is female. (Divide Row 1, Column 1 by Row 3, Column 1 and place in Row 1, Column 2.) Calculate the percentage of total enrollment that is male. (Divide Row 2, Column 1 by Row 3, Column 1 and place in Row 2, Column 2.) Note: Row 1, Column 2 plus Row 2, Column 2 should total 100%.
- Ask coaches to confirm the names of those individuals who are on the team as of the first date of regular season competition, and cross out the names of those who were cut from the team or quit the team prior to the first regular season competitive event. Determine the total number of interscholastic athletics participants that are girls, (and place in Row 1, Column 3). In order to determine the total number of athletics participants, an individual should be counted each time he or she participates on a team. For example, if Jane Doe competes on the varsity volleyball team, the junior varsity volleyball team, the junior varsity basketball team, and the varsity softball team, she should be counted as four participants (do not include club or intramural sports participants, cheerleaders, dance teams, or pom squads). Calculate the same way for boys and girls. * In addition, should 8th grade students and below play on a Freshman, Junior Varsity, or Varsity team, they should be counted for each team and sport on which they participate. If applicable, please asterisk in the above notation as to how many 8th grade students & below are included in the totals. Using the same procedure, determine the total number of interscholastic athletic participants that are boys, (and place in Row 2, Column 3). Add Row 1, Column 3 plus Row 2, Column 3 to get total participants and place in Row 3, Column 3.
- Calculate the percentage of female participation. (Row 1, Column 3 divided by Row 3, Column 3 and place in Row 1, Column 4.) Calculate the percentage of male participation. (Row 2, Column 3 divided by Row 3, Column 3 and place in Row 2, Column 4.) Note: Row 1, Column 4 plus Row 2, Column 4 should total 100%.

Note: While being within three percent is not a formal compliance standard; if the percent listed in Row 1, Column 4 is within 3% of Row 1, Column 2, then it provides a good target within which compliance is likely.

Principal's Signature: [Signature]

Date: 4/15/09

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2008-2009
ACCOMMODATION OF INTERESTS AND ABILITIES
SUMMARY PROGRAM CHART T-2

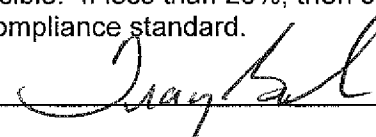
KHSAA
 Form T2
 Rev. 12/08

Participation Opportunities Test Two

		Column 1	Column 2	Column 3	Column 4	Column 5
Program		Number of Teams Currently Offered	Number of Participants	Number of Teams Added Since the beginning of the 2004-2005 School Year	Number of participants for the 2008-09 school year who are playing on teams added since the 2004-05 school year	Percent of Total Participation By Sex Added Since the beginning of the 2004-2005 School Year
GIRLS	Row 1	varsity: 8	106	0	0	
	Row 2	j.v.: 3	56	0	0	
	Row 3	frosh: 3	43	0	0	
	Row 4	total: 14	205	0	0	0
BOYS	Row 5	varsity: 8	146	0	0	
	Row 6	j.v.: 3	65	0	0	
	Row 7	frosh: 3	36	0	0	
	Row 8	total: 14	247	0	0	0

- 1) For Column 1, list the number of interscholastic teams offered for girls and boys at each competitive level (varsity, junior varsity, and freshman). For girls, total each of the entries in Rows 1, 2, and 3 into Row 4. For boys, total Rows 5, 6, and 7 into Row 8.
- 2) For Column 2, list the number of participants at each level. For girls, total each of the entries in Rows 1, 2, and 3 into Row 4. For boys, total Rows 5, 6, and 7 into Row 8. **Note:** The totals in Row 4 for girls and in Row 8 for boys must be the same as the totals in Form T-1, Column 3, Rows 1 and 2 respectively.
- 3) For Column 3, list the number of interscholastic teams that have been added in the last five years at each competitive level. Count each team added during the 5 year period only one time. e.g. Girl's junior varsity soccer was added 3 years ago, count the team only once, not 3 times. For girls, total the entries in Rows 1, 2, and 3 into Row 4. For boys, total Rows 5, 6, and 7 into Row 8.
- 4) For Column 4, list the number of participants that are **currently** on each level of the teams that were added in the last five years. If a team was added previously but no longer exists, there are no current participants to be added for that team. For girls, total the entries in Rows 1, 2, and 3 into Row 4. For boys, total Rows 5, 6, and 7 into Row 8.
- 5) For Column 5, calculate the percentage of participants that have been added in the last five years. For girls, take the number in Column 4, Row 4 and divide by the number in Column 2, Row 4. For boys, take the number in Column 4, Row 8 and divide it by the number in Column 2, Row 8.

Note: If the percentage of current participants added in the last five years is 25% or greater, compliance with Test Two may be possible. If less than 25%, then compliance with Test Three should be analyzed. **CAUTION:** 25% is not a formal compliance standard.

Principal's Signature:  Date: 4/15/09

2008-2009
ACCOMMODATION OF INTERESTS AND ABILITIES
SUMMARY PROGRAM CHART T-3

KHSAA
 Form T3
 Rev. 12/08

Participation Opportunities Test Three

FOR ANY QUESTION ANSWERED "YES" IDENTIFY THE RESPECTIVE SPORT(S).

	GIRLS (Yes / No)		BOYS (Yes / No)
1. For a sport <u>not</u> currently offered in your interscholastic athletics program, is there sufficient interest to form a viable interscholastic team based on participation on an <u>intramural team</u> .	No		No
2 For a sport <u>not</u> currently offered, is there sufficient interest, based on the responses to your most recent Student Interest Survey, to form a viable <u>interscholastic team</u> for a sport not currently offered. If yes, what sport?	No		No
3. For a sport currently offered at the junior varsity or freshman level is there sufficient interest, based on your most recent Student Interest Survey, to form a <u>varsity team</u> not currently offered?	No		No
4. For a sport currently offered at the varsity level only, is there sufficient interest, based on your most recent Student Interest Survey, to form a viable team for a <u>junior varsity or freshman team</u> that is not currently offered?	No		No
5. If you answered YES to question (1), (2), (3), or (4), are there enough high schools in the geographic area offering the sport (at the appropriate level) to allow for the development of a reasonable schedule of competition?			

Plans to Address Interest:

Inventory completed on biannual basis and will be given next school year ^{spring} (2010). Was completed Spring 2008.

Principal's Signature: *Gray Bal* Date: 4/15/09



**2008-2009
ACCOMODATION OF INTERESTS AND ABILITIES
SUMMARY PROGRAM CHART T-4**

KHSAA
Form T4
F:Forms/T4
Rev.12/08

Levels of Competition Test One

		Column 1	Column 2	Column 3
Girls	Team Levels	Number of Teams Currently Offered	Number of Participants	Percentage of Participants at Each Level
Row 1	varsity:	8	106	52%
Row 2	j.v.:	3	56	27%
Row 3	frosh:	3	43	21%
Row 4	total:		205	100%
Boys				
Row 5	varsity:	8	146	60% 59
Row 6	j.v.:	3	65	26%
Row 7	frosh:	3	36	14% 15
Row 8	total:		247	100%

- 1) Column 1, list the number of interscholastic teams offered for girls and boys at each competitive level; varsity, junior varsity, and freshman. (Refer to Form T-2, Accommodation of Interests and Abilities, Summary Program Chart 2, Column 1.)
- 2) For Column 2, list the number of participants at each level. For girls, total the entries in Rows 1, 2, and 3 into Row 4. For boys, total the entries in Rows 5, 6, and 7 into Row 8. (Refer to Form T-2, Accommodation of Interests and Abilities, Summary Program Chart 2, Column 2.)
- 3) For Column 3, calculate the percentage of female and male participants at each level.
 For girls' varsity, junior varsity, and frosh, respectively:
 Divide Column 2, Row 1 by Column 2, Row 4, and place the percentage in Column 3, Row 1
 Divide Column 2, Row 2 by Column 2, Row 4, and place the percentage in Column 3, Row 2.
 Divide Column 2, Row 3 by Column 2, Row 4, and place the percentage in Column 3, Row 3.

 For boys' varsity, junior varsity, and frosh, respectively:
 Divide Column 2, Row 5 by Column 2, Row 8, and place the percentage in Column 3, Row 5.
 Divide Column 2, Row 6 by Column 2, Row 8, and place the percentage in Column 3, Row 6.
 Divide Column 2, Row 7 by Column 2, Row 8, and place the percentage in Column 3, Row 7.

Principal's Signature: Gray Bell Date: 4/15/19

**2008-2009
ACTUAL EXPENDITURES - PROGRAM COMPARISON CHART 1
TO INCLUDE BOOSTER CLUB FUNDING**

	equipment and supplies		travel		awards		coaches' salaries (to include supplemental and extended employment; dollar amount required)		facilities improvements		publications (if sport-specific)	
	Expenditures		Expenditures		Expenditures		Expenditures		Expenditures		Expenditures	
	School	Booster	School	Booster	School	Booster	School	Booster	School	Booster	School	Booster
G basketball	\$3413		\$3846		\$466		\$9090		\$0		\$0	
B basketball	\$9463		\$5218		\$152		\$9090		\$0		\$0	
G softball	\$8213		\$3400		\$351		\$3590		\$42		\$0	
B baseball	\$6964		\$12196		\$231		\$4190		\$437		\$0	
G cross country	\$300		\$0		\$0		\$393		\$0		\$0	
B cross country	\$155		\$0		\$0		\$372		\$0		\$0	
G golf	\$610		\$563		\$100		\$195		\$0		\$0	
B golf	\$0		\$562		\$100		\$195		\$0		\$0	
G soccer	\$4707		\$1352		\$595		\$3290		\$1323		\$0	
B soccer	\$2664		\$1352		\$90		\$2645		\$0		\$0	
G swimming												
B swimming												

16,210
23,923
15,596
24,018
673
527
2,468
1,857
111,267
6751

G = 10,623
B = 31,740
46,363

232
27%

- Total expenditures on T-35 and T-36 on the 2008-2009 year report due by April 15, 2009, should reflect the total monies spent (rounded off to nearest dollar) for the entire school year of 2007-2008 ending June 30, 2008.
- Booster Club Funding/Contributions must be included in the above expenditures total. (Note: It is illegal for coaches to be paid by Booster Clubs - Reference KHSAA Bylaw 27)

Principal's Signature: *[Signature]* Date: 4/15/09

2008-2009
ACTUAL EXPENDITURES - PROGRAM COMPARISON CHART 2
TO INCLUDE BOOSTER CLUB FUNDING

	equipment and supplies		travel		awards		coaches' salaries (to include supplemental and extended employment; dollar amount required)		facilities improvements		publications (if sport-specific)	
	Expenditures		Expenditures		Expenditures		Expenditures		Expenditures		Expenditures	
	School	Booster	School	Booster	School	Booster	School	Booster	School	Booster	School	Booster
G track	\$0		\$0		\$0		\$598		\$0		\$0	
B track	\$0		\$0		\$0		\$597		\$0		\$0	
G tennis	\$229		\$493		\$0		\$195		\$0		\$0	
B tennis	\$616		\$493		\$0		\$195		\$0		\$0	
G volleyball	\$1243		\$2783		\$558		\$390		\$0		\$0	
B wrestling												
G (list sport)												
B football	\$15886		\$2752		\$577		\$1635		\$60		\$0	
G (list sport)												
B (list sport)												

598
597
1917
2,204
7,974
30,910

1. Total expenditures on T-35 and T-36 on the 2008-2009 year report due by April 15, 2009, should reflect the total monies spent (rounded off to nearest dollar) for the entire school year of 2007-2008 ending June 30, 2008.

2. Booster Club Funding/Contributions must be included in the above expenditures totals. Indicate percentage of total expenditures for each gender: (If disparities are obvious, list on your Corrective Action Plan (T-60) what action you will take to correct the problem).

#	Gender	Expenditures	Percentage
247	Boys	\$ 90,887	61%
205	Girls	\$ 57,308	39%
Total:		\$ 148,195	100%

Principal's Signature: 4/1/2009 Date: 4/15/09

2008-2009 KHSAA TITLE IX ATHLETICS AUDIT

KHSAA
Form T41
Rev. 12/08

Checklist - Overall Interscholastic Athletics Program

DIRECTIONS:

For the Areas of Compliance (Opportunities and Benefits) listed on the left hand side of the page, place a checkmark under the appropriate column identifying whether your school provided an advantage to the Girls' Program, or to the Boys' Program or to Neither Program. A review of T-35 and T-36 spending patterns might be helpful in completing this form.

Areas of Compliance:	ADVANTAGE TO:		
	GIRLS' PROGRAM	BOYS' PROGRAM	NEITHER PROGRAM
OPPORTUNITIES			
Accommodation of Interest and Abilities			✓
BENEFITS			
Equipment and Supplies		✓	
Scheduling of Games and Practice Time			✓
Travel and Per Diem Allowances		✓	
Coaching			✓
Locker Rooms, Practice and Competitive Facilities			✓
Medical and Training Facilities and Services			✓
Publicity			✓
Support Services			✓
Athletic Scholarships			✓
Tutoring			✓
Any meals provided for home			✓

If an advantage is shown, corrective action should be shown on T-60 (Corrective Action Plan).

Principal's Signature: *Wayne* Date: 4/15/09

2008-2009

TITLE IX

CORRECTIVE ACTION PLAN

SCHOOL NAME

Spencer County High School

DIRECTIONS:

1. For Column 1, indicate the intended area (Opportunities or Benefits) which needs corrective action in order to achieve gender equity. For Column 2, write the suggested change or activities that will correct the area in need of alteration. For Column 3, include the estimated completion date for the changes or activities.
2. It is possible to attain compliance with Title IX and no longer need "corrective" action. However, the KHSAA strongly encourages compliant schools to identify items for improvement (Column 1), activities to accomplish the improvement (Column 2) and a timetable for completion (Column 3) that will strengthen the athletic program.
3. You may copy this form as needed. Please attach corrective action plans along with audit forms and submit by April 15, 2009.

COLUMN 1 ITEM FOR CORRECTION/ IMPROVEMENT	COLUMN 2 SUGGESTED CHANGE/ ACTIVITIES	COLUMN 3 SCHOOL YEAR, COMPLETION DATE OF CORRECTION FOR PROJECT
Benefit : Travel	Restrict travel to certain Radius from school. (Baseball traveled to FL for spring break)	Create several night ops. for a women's team. 2012
Benefit : Equipment	Large differential board on "Spit packs" purchased through school.	Create program to make purchases where individual purchase does not go through individual sports account.
Benefit : Locker rooms / storage area	Remodel softball locker room	May 2009
Benefit : Facility	Complete softball dugout expansion Complete Football/Soccer/Softball press box	May 2009

Principal's Signature: Maya

Date: 4/15/09



**KHSAA TITLE IX RE-VISIT
VERIFICATION OF FORMS
2008-2009 SCHOOL YEAR**

KHSAA
Form T50
Rev. 08/08
Page 1 of 2

The Spencer County
High School Taylorsville
City, Kentucky

certifies to the KHSAA that the following is an accurate and true representation of the facts surrounding compliance with 20 V.S.C. Sections 1681-1688, it. Seq. (also known as Title IX).

The following persons are to be identified:

School District Title IX Coordinator:

Name	Brian Higdon
Professional Title	Athletic Director
Phone Number	(502) 477-3255
Address	520 Taylorsville Rd, Taylorsville, KY 40071

School Title IX Coordinator:

Name	Wes Napper
Professional Title	Assistant Athletic Director
Phone Number	(502) 477-3255
Address	520 Taylorsville Rd, Taylorsville, KY 40071

The following *signatures* verify the authenticity of the documents included:

	SIGNATURE	DATE
Principal		4/15/09
School Title IX Coordinator		4/15/09
Superintendent		4/15/09
District Title IX Coordinator	Brian Higdon	4/15/09
School Board Chairperson		



**KHSAA TITLE IX RE-VISIT
VERIFICATION OF FORMS
2008-2009 SCHOOL YEAR**

School Name: Spencer County High School

Gender Equity Review Committee Members:

MEMBER NAME	TITLE	SIGNATURE	DATE	(✓)*
Brian Hayden	Athletic Director	Brian Hayden	4/15/09	✓
Wes Napper	Assistant Athletic Director / Coach	Wes Napper	4/15/09	✓
Korey Hartman	Student	Korey Hartman	4/15/09	
Mackenzie Smith	Student	Mackenzie Smith	4/15/09	
Clark Teague	Co-ed Track Coach	Clark Teague	4/15/09	
Matt Pawowski	Football Coach	Matt C. P.	4/15/09	
Paul Hartman	Parent ^{male} / _{female}			

- Please check (✓) if Committee member has reviewed this final submission.

2008-2009
ACCOMMODATION OF INTERESTS AND ABILITIES
SUMMARY PROGRAM CHART 1

KHSAA
Form T1
Rev. 12/08

Participation Opportunities Test One

		(Column 1)	(Column 2)	(Column 3)	(Column 4)
	Program	Enrollment	Percentage of Total Enrollment	Number of Interscholastic Participants (double and triple count)	Percentage of Total Participation
Row 1	GIRLS	403	51%	205	51% 45
Row 2	BOYS	386	49%	247	64% 55
Row 3	Totals	789	100%	209 452	100%

Instructions:

*Number of 8th grade students & below used in Column 3 and Column 4 calculations : 13

- Determine the total number of girls enrolled, (place in Row 1, Column 1). Determine the total number of boys enrolled, (place in Row 2, Column 1).
- Add the total number of girls and boys enrolled to determine total enrollment, (place in Row 3, Column 1).
- Calculate the percentage of total enrollment that is female. (Divide Row 1, Column 1 by Row 3, Column 1 and place in Row 1, Column 2.) Calculate the percentage of total enrollment that is male. (Divide Row 2, Column 1 by Row 3, Column 1 and place in Row 2, Column 2.) Note: Row 1, Column 2 plus Row 2, Column 2 should total 100%.
- Ask coaches to confirm the names of those individuals who are on the team as of the first date of regular season competition, and cross out the names of those who were cut from the team or quit the team prior to the first regular season competitive event. Determine the total number of interscholastic athletics participants that are girls, (and place in Row 1, Column 3). In order to determine the total number of athletics participants, an individual should be counted each time he or she participates on a team. For example, if Jane Doe competes on the varsity volleyball team, the junior varsity volleyball team, the junior varsity basketball team, and the varsity softball team, she should be counted as four participants (**do not include club or intramural sports participants, cheerleaders, dance teams, or pom squads**). Calculate the same way for boys and girls. * In addition, should 8th grade students and below play on a Freshman, Junior Varsity, or Varsity team, they should also be counted for each team and sport on which they participate. If applicable, please asterisk in the above notation as to how many 8th grade students & below are included in the totals.
Using the same procedure, determine the total number of interscholastic athletic participants that are boys, (and place in Row 2, Column 3). Add Row 1, Column 3 plus Row 2, Column 3 to get total participants and place in Row 3, Column 3.
- Calculate the percentage of female participation. (Row 1, Column 3 divided by Row 3, Column 3 and place in Row 1, Column 4.) Calculate the percentage of male participation. (Row 2, Column 3 divided by Row 3, Column 3 and place in Row 2, Column 4.) Note: Row 1, Column 4 plus Row 2, Column 4 should total 100%.

Note: While being within three percent is not a formal compliance standard; if the percent listed in Row 1, Column 4 is within 3% of Row 1, Column 2, then it provides a good target within which compliance is likely.

Principal's Signature: [Signature] Date: 4/15/09