



## KHSAA TITLE IX RE-VISIT FINAL AUDIT REPORT

(For schools re-visited during the 2015-2016 school year)

School: Crittenden County

Prepared By: Gary W. Lawson

Date of Re-Visit: October 21, 2015

Telephone Number of Reviewer: **(859) 299-5472**

Reviewed By: **Darren Bilberry, Asst. Commissioner**

### 1. Completed Required Forms

Verification of Forms (Form GE-19) Yes  No

Participation Opportunities Summary Chart (Form T-1, T-2, T-3 & T-4) Yes  No

Benefits Summary Charts (Forms T-35 & T-36) Yes  No

Checklist Overall Athletics Program (Form T-41) Yes  No

Improvement Plan Summary Charts (Form T-60) Yes  No

### 2. Opportunities Component of Title IX Compliance

Area of Compliance:  
(Check One or More)

X	A	Substantial Proportionality
	B	History and Continuing Practice Of Programs Expansion
	C	Full and Effective Accommodation of Interest and Abilities

A). Was the Substantial Proportionality Test (T-1) an area in which the school met Title IX Opportunities compliance?

Yes  No

Comments: According to the rosters and data submitted, the school has met the standard established by Test 1 for provision of athletic opportunities during two of the past three school years (2012-13 and 2014-15) and is currently meeting that standard. The T-1 form in the 2014-15 annual Title IX report shows that females made up 46% of the athletic participants, and they were 47.6% of the enrollment.

B). Was the History and Continuing Practice of Program Expansion Test (T-2) an area in which the school met Title IX Opportunities compliance?

Yes  No

Comments: The rosters and information submitted by the school indicate that the standard established by Test 2 for provision of athletic opportunities has not been met during any of the past three school years. The most recent T-2 form shows that no teams have been added for female participation at any level during the past five years.

C). Was the Full and Effective Accommodations of Interest and Abilities Test (T-3) an area in which the school met Title IX Opportunities compliance?

Yes  No

Comments: Although the responses on the most recent T-3 form indicate that the standard established by Test 3 is being met, there is no evidence provided that shows that the indicated interest in cross country (16) has been pursued for validity. Therefore, there is no verification that this standard is being met.

3. Is the school's most recent Student Interest Survey accurate in relation to the assessment of Interests & Abilities?

Yes  No

Comments: The T-63 form found in the 2013-14 annual Title IX report shows that a 100% completion rate was received on the most recent student athletic interest survey.

4. Checklist of the Title IX Components of the Interscholastic Program

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>The February 9, 2000 Title IX school visit report rated this area <i>Satisfactory</i> because it appeared likely the school was meeting the standard established by Test 3 for provision of athletic opportunities. The November 5, 2008 school visit again rated this area <i>Satisfactory</i>. The report stated that the school appeared to be meeting the standard of Test 1 at that time. Annual reports submitted to KHSAA for the past three years give strong indication that the standard established by Test 1 is currently being met. The percentage of participation for females is within one percent of their percentage of enrollment. <u>It was emphasized to school officials that the standard of Test 3 could be met if the indicated interest (16) in cross country was pursued for validity.</u> (See detailed explanations for each of the three opportunities tests on page 2 of this report.) During the most recent school visit, the Title IX file was reviewed and found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five years, a board-approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, game schedules for all varsity teams, facility usage schedules for the gym and weight training room, a school-generated athletic handbook for coaches, written and signed booster club agreements with all booster clubs, regulations regarding entry into the school's Athletic Hall of Fame, guidelines for awarding letters and bars (see <i>Publicity</i> and <i>KHSAA Recommended Action</i>), written designation of the locker room and equipment storage space assigned each team, minutes for all Gender Equity Review Committee meetings for the past three years, an equitable plan for the review and replacement of uniforms, written regulations regarding transportation for student athletes (see <i>Travel and Per Diem Allowances</i> and <i>KHSAA</i></p>

Accommodation of Interests and Abilities continued			<i>Recommended Action), and a copy of the Athletic Facility Emergency Medical Plan (KRS 160.445). School officials were commended for the development and maintenance of a comprehensive and organized Title IX file.</i>
Equipment and Supplies	X		Both the 2000 and 2008 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . All uniforms and equipment reviewed during the most recent visit were of mid-to-high quality and appeared to be supplied in equitable quantities. The review of the Title IX file showed the school has a uniform review, rotation, and/or replacement plan based on a five-year cycle for all teams except boys and girls golf whose shirts are replaced annually. Interviews with coaches and student athletes indicated that this plan is being implemented. Data submitted in the 2013-14 and 2014-15 annual Title IX reports indicate that the school was spending approximately \$165 per female athlete and \$222 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		The previous two Title IX school visit reports designated this benefit category <i>Satisfactory</i> . According to information provided during the most recent visit, the number of competitive events scheduled for teams of "like" sports was comparable. An equitable facility usage schedule was provided for the gym. A usage policy that showed equitable access to the weight training room was contained in the Title IX file. The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the provision of parity regarding this benefit.
Travel and Per Diem Allowances	X		The 2000 and 2008 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2008 report did state that the written guidelines for travel and per diem pertained only to school district employees—not student athletes. It was requested that written regulations to provide equitable travel and per diem for student athletes be developed. The review of the Title IX file during the most recent visit revealed that the

Travel and Per Diem Allowances continued			school had developed equitable guidelines regarding the mode of transportation but <u>did not have regulations for per diem—meals and lodging.</u> (See KHSAA Recommended Action.) Information submitted in the 2013-14 and 2014-15 annual Title IX reports show that the school was spending approximately \$112 per female athlete and \$58 per male athlete for travel and per diem.
Coaching	X		This benefit category was rated <i>Satisfactory</i> in both previous Title IX school visit reports. The principal and athletic director are responsible for the evaluation of all head coaches. A written instrument is currently being used as part of this process. A review of the district's extra service pay schedule for coaches showed parity. A review of the <i>Salaries</i> columns on the most recent T-35 form indicated that the total amounts spent for coaching salaries for teams of "like" sports was comparable. Information provided in the 2014-15 annual Title IX report shows that female teams have 11 participants per coach and the male teams have 12.5 participants per coach. Information gathered during the most recent visit revealed that 83% (5/6) of the head coaches of girls teams and 60% (3/5) of the head coaches of boys teams are employed on the school campus.
Locker Room, Practice and Competitive Facilities	X		A <i>Satisfactory</i> rating was assigned to this benefit category in 2000 and 2008. The tour of facilities during the most recent visit showed that all teams had designated dressing rooms and equipment storage areas. Shared dressing rooms seemed to be assigned equitably, and the equipment storage areas were in relatively close proximity to the competitive venues. As was true at the time of the 2008 visit, the baseball and softball fields located in the Marion City Park offer similar amenities, but some of those at the baseball field are of higher quality. The advantage for the males at the baseball field is balanced by the amenities provided at the exclusive girls soccer field which is located adjacent to the city park on school-owned property. Several improvements have been made at the softball

			field since the 2008 visit. These improvements include new fencing and drainage upgrades which indicate progress toward parity for all athletic venues.
Medical and Training Facilities and Services	X		Both the two previous school visit reports designated this benefit category <i>Satisfactory</i> . The 2008 report documented that the school did <u>not</u> have an equitable usage schedule for the weight training room in the Title IX file or posted at the facility. The most recent visit revealed that there was an equitable usage policy for the weight room in the Title IX file and posted at the facility. <b>IT IS REQUESTED THAT WHEN THIS REPORT IS RECEIVED, THE WEIGHT ROOM POLICY SHOULD BE PUT IN CALENDAR/SCHEDULE FORM (more user-friendly) WHICH SHOULD BE POSTED AT THE FACILITY.</b> The school has a large, well-equipped weight room located in Rocket Arena with several training options that appeared to be suitable for female athletes. The school currently provides no athletic training services. Baptist Health in Princeton, Kentucky offers free athletic physical examinations for any Crittenden County student on a designated day each spring.
Publicity		X	The 2000 and 2008 school visit reports rated this benefit category <i>Satisfactory</i> . The school currently has one varsity cheerleading squad that cheers at all home and away games for the football team. They also cheer at all home games and at away games versus district opponents for the boys and girls basketball teams. The pep band performs at all home games for the football and boys and girls basketball teams. A local radio station broadcasts all home and away football games. They also cover all home games and away games versus district opponents for the boys and girls basketball teams. The current practice at the school is to display no banners for athletic recognition for individual participants or teams. The school has an Athletic Hall of Fame, and there are criteria for induction in the Title IX file. The file contained no equitable guidelines for the provision of

Publicity continued			awards or postseason banquets. The expenditures listed in the 2014-15 annual report showed a significant disparity in spending for awards. The report indicated that the school was spending approximately \$15 per female athlete and \$45 per male athlete. Evidence revealed during the most recent visit indicated that at least part of this disparity was the result of inaccurate financial reporting. A comparison of "like" sports—baseball/softball and boys/girls basketball—also appeared inequitable. The combination of these two factors—lack of equitable written guidelines and inequitable expenditures—render this benefit category to be <u>deficient</u> at this time. (See KHSAA Recommended Action in relation to new deficiencies.)
Support Services	X		The school was rated <i>Satisfactory</i> in this benefit category in the 2000 and 2008 Title IX school visit reports. The 2008 report documented that total athletic spending appeared to be <u>outside of generally accepted parameters for the provision of parity during the 2006-07 and 2007-08 school years</u> . The school currently has booster clubs for all school sponsored sports. All booster clubs have their funds in accounts off the school campus. There are signed agreements with all booster organizations. The Internal Analysis Summary for the 2013-14 annual Title IX report shows that the school was spending approximately \$445 per female athlete and \$735 per male athlete for total support. This spending seemed to significantly favor males. The Internal Audit Summary for 2014-15 annual Title IX report shows the school spent approximately \$578 per female athlete and \$540 per male athlete. This spending slightly favored female athletes. The pattern of spending shown in 2008 and, to some degree, at the time of the most recent school visit indicates a need for <u>monitoring by school officials and documentation of this monitoring on the school's Title IX Improvement Plan</u>

			(T-60 form).
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		

5. Brief Summary/Analysis of the Improvement Plan (Form T-60)

The school's most recent T-60 forms call for the following:

- adding a press box at the softball field;
- adding more female-friendly weights in the weight training room.

IT SHOULD BE NOTED THAT THE 2013-14 ANNUAL REPORT SHOWED NO NEEDED ITEMS FOR IMPROVEMENT ON THE T-60 FORM.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The one deficiency designated as a result of the October 21, 2015 Title IX school visit is in the benefit category of *Publicity*. The lack of equitable guidelines for the provision of awards and postseason banquets and the disparity shown in spending in this area combined to result in this deficiency. (See KHSAA Recommended Action.)

The report also lists an *area of concern* in regard to the development of equitable written guidelines concerning per diem—meals and lodging—for student athletes. (See KHSAA Recommended Action.)

7. KHSAA Recommended Action in relation to new deficiencies

PUBLICITY

- On or before February 15, 2016, the school is to submit to KHSAA equitable written guidelines for the provision of postseason awards and banquets. These guidelines are to include administrative oversight in relation to this benefit category.
- The school's 2015-16 annual Title IX report is to contain complete and accurate expenditure totals in the Awards column on the T-35 form.

Although not currently designated as deficient, the following area of concern is to be addressed in an attempt to insure that equitable benefits are provided.

TRAVEL AND PER DIEM ALLOWANCES

On or before February 15, 2016, the school is to submit to KHSAA a written expansion of the current guidelines for this benefit category which addresses the equitable provision of meals and lodging for student athletes.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated by the November 5, 2008 Title IX school visit report.

## 9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Angela Starnes, 209 Summit Dr., Marion, KY 42064  
(270) 704-0049

District Level Title IX Coordinator: Al Starnes, 209 Summit Dr., Marion, KY 42064  
(270) 704-0036

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Ethan Hunt	Student Athlete	(270) 704-0049
Jessi Brewer	Student Athlete	(270) 704-0049
Cheyanne Reed-Warriner	Softball Coach	(270) 556-5102
Shannon Hodge	Girls Basketball Coach	(270) 704-0593
Bryce Winders	Assistant Athletic Director	(270) 965-2248
Donnie Phillips	Head Baseball Coach	(270) 625-1875
Ken Geary	Girls Soccer Coach	(270) 965-2248
Cara Merrick	Volleyball Coach	(270) 965-2248
Al Starnes	Football Coach	(270) 704-0036
Cindy Crabtree	Cheerleading Coach	(270) 965-2248
Denis Hodge	Basketball Coach	(270) 965-2248
Angela P. Starnes	AD/Coach/Dist.Title IX Coord.	(270) 965-2248
Vicki Hatfield	Golf Coach	(270) 965-2248
Curtis Brown	Principal	(270) 965-2248

## 10. Comments

Two people from the community attended the Public Comments session. At the end of this meeting, the school administrators and athletic director were commended for their comprehensive preparation for this school visit. The session was adjourned at 4:40 pm.