



**KHSAA TITLE IX RE-VISIT  
FINAL AUDIT REPORT**

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

School: Hart County  
 Prepared By: Gary W. Lawson  
 Date of Re-Visit: November 2, 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)

	A	Substantial Proportionality
	B	History and Continuing Practice Of Programs Expansion
X	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 the provision of athletic opportunities during school year 2012-13 and 2013-14 but did not meet the standard in 2014-15. It does appear that the school has made significant improvement in the provision of opportunities to participate since the last school visit. The 2014-15 annual report shows that the percentage of participation for females was 46.4% and the percentage of enrollment for females was 51.7%.

- 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 indicate that the standard established by Test 2 for the provision of athletic opportunities has been met during one of the past three school years (2012-13). The addition of archery and soccer programs during the past five years has helped the school to remain very close to the 25% increase in participation that is needed to meet this test. The T-2 form in the 2014-15 annual report shows a 23.3% increase in participation by females.

- 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: The responses on the T-3 form in the 2014-15 annual Title IX report indicate that the standard established by Test 3 is being met. The school has completed the student athletic interest survey for 2015-16. The survey showed some indicated interests in bowling and swimming, but follow up meetings regarding these sports did not validate the interest. A summary of the attendance at these meetings have been made available to KHSAA and will be documented on the T-3 form in the 2015-16 annual Title IX report.

3. Is the school's most recent Student Interest Survey accurate in relation to the assessment of Interests & Abilities?  
Yes  No

Comments: According to documentation provided by the school, a 100% completion rate was received on the 2015-16 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 May 14, 2001 Title IX school visit report rated this area <i>Satisfactory</i> because it appeared the school was meeting the standard established by Test 1 for provision of athletic opportunities. The December 1, 2009 report designated this area <i>Deficient</i> because miscalculated data prevented the school from offering evidence that the standard established in any of the three opportunities tests was being met. The most recent Title IX annual reports show that the school has added three sports for females—archery, and varsity and junior varsity soccer. These sports have significantly increased the percentage of female participation. The information gathered from the 2015-16 athletic interest survey shows there was an indicated interest in bowling (21) and swimming (21). Follow up meetings held by school officials did not validate this interest. Evidence of these meetings are posted in the school's Title IX file. This information makes it very likely that the standard established in Test 3 is currently being met. (See detailed explanation of all three of the opportunities tests on page 2 of this report.) The school's Title IX file was reviewed during the visit. It was 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 school sponsored varsity teams, usage schedules for the gym, indoor hitting facility, and the weight training room used by females, some written guidelines regarding the provision of awards and recognition of athletic accomplishments (see <i>Publicity</i> and <i>KHSAA Recommended Action</i>), written designation of the locker room and athletic equipment storage space assigned each team, agendas and some minutes for Gender Equity Review Committee</p>

<p>Accommodation of Interests and Abilities continued</p>			<p>meetings held during the past three years. SCHOOL OFFICIALS WERE REMINDED THAT WRITTEN MINUTES (not just agendas) SHOULD BE KEPT FOR <u>ALL</u> GENDER EQUITY MEETINGS.) The file also contained a uniform review, rotation and/or replacement plan, written guidelines and regulations regarding travel and meal provision for student athletes (see <i>Travel and Per Diem Allowances</i> and <i>KHSAA Recommended Action</i>), copies of written booster club agreements, and a copy of the school's athletic facility emergency medical plan. School officials were commended for the significant improvement in the organized and comprehensive Title IX file that has been developed since the last school visit.</p>
<p>Equipment and Supplies</p>	<p>X</p>		<p>Both the 2001 and 2009 Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2009 report did document that the school did not have a written uniform review, rotation, and/or replacement plan in place. The most recent visit showed that the school had what appeared to be equitable regulations in place for the review and/or replacement of uniforms. The documentation showed that all uniforms, except boys and girls tennis, archery, and boys and girls golf (which are replaced annually) are reviewed for replacement on a four-year cycle. All the uniforms and equipment inspected during the visit appeared to be of high quality and was supplied in equitable quantities. According to data submitted in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$55 per female athlete and \$173 per male athlete for equipment and supplies. It was suggested that spending in this category be evaluated and monitored for accuracy and the provision of parity. (See <i>Support Services</i>.)</p>
<p>Scheduling of Games and Practice Time</p>	<p>X</p>		<p>Both previous Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2009 report stated that no usage schedules were posted at any of the shared athletic venues. During the most recent visit, equitable usage schedules were provided for the gym, indoor hitting facility, and the weight training room that is used only by female athletes. Unlike the 2009 visit, information gathered recently gives</p>

Scheduling of Games and Practice Time continued			a strong indication that facilities are being shared equitably. Information provided during this latest visit also showed that the number of competitive events schedules for teams of "like" sports was comparable. 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 two previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2009 report documented that the school had no written guidelines regarding equitable provision for these benefits. The requested guidelines were submitted to KHSAA on April 30, 2010. The guidelines seen during the most recent visit did not specifically address the mode of transportation and the provision of per diem (both meals and lodging) needed to address parity for student athletes. (See <i>KHSAA Recommended Action</i> ). The information submitted in the 2013-14 and 2014-15 annual Title IX reports indicate that the school was spending approximately \$47 per female athlete and \$52 per male athlete for travel and per diem.
Coaching	X		Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The principal is responsible for the evaluation of all head coaches, and he does not use a written instrument as part of the assessment at this time. A review of the district's extra service pay schedule indicated parity. Information submitted on the T-35 form in the 2014-15 annual Title IX report showed that the total amounts spent for coaching salaries for teams of "like" sports were comparable. This same annual report indicated that the coaching ratio is 13 participants per coach for both female and male athletic teams. Information provided during the most recent visit showed that 38 % (3/8) of the head coaches of girls teams and 63% (5/8) of the head coaches of boys teams were on-campus employees.
Locker Room, Practice and Competitive	X		The 2001 and 2009 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2009 report did document that the school did

<p>Facilities</p> <p>Locker Room, Practice and Competitive Facilities continued</p>			<p>not provide a written listing of locker room assignments. This information was submitted to KHSAA on April 30, 2010. The report also stated a significant disparity existed at the softball field where there was no press box. The most recent visit revealed that a press box had been constructed at the softball field which meant the amenities at the softball and baseball fields were similar. The tour of facilities showed that the amenities provided at the indoor and outdoor venues for practice and competition were comparable. There were several large locker rooms in the gym and at the outdoor athletic complex. Most of the locker rooms were shared, but the assignments appear equitable. All teams were provided athletic storage space, and in most cases, this space was in close proximity to the teams' competitive venues and assigned equitably. Evidence of the provision of locker and storage equipment space was a vast improvement over the situation in 2009.</p>
<p>Medical and Training Facilities and Services</p>			<p>The 2001 Title IX school visit report rated this benefit category <i>Satisfactory</i>. The 2009 report rated this category <i>Deficient</i>. The second report stated that no females used the weight training room. The only access to the room was gained by walking through male locker rooms, and there was little, if any, equipment at the facility that was suitable for use by females. The most recent visit showed that the school now has two weight training rooms. One weight room that is basically the same as in 2009 is located in the football dressing room. This facility is now the male weight room used exclusively by male teams. Weight room 2 is a new facility located in the athletic complex and is easily accessible to female athletes. This venue is used by female teams only. This facility has numerous training options that are very suitable for use by female athletes. Interviews with coaches indicated appreciation for this needed improvement. <u>School officials were commended for the steps taken to address the earlier deficiency.</u> No student athletes receive the services of an athletic trainer. Physical examinations are the</p>

			responsibility of the student athletes.
Publicity	X		Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The 2009 report did state that the school had no written guidelines regarding the provision of awards. The school currently sponsors one cheerleading squad which cheers at all home football and home boys and girls basketball games. The pep band performs at all home football and home boys and girls basketball games as well. A local radio station broadcasts all home and away football and boys and girls basketball games. The review of the Title IX file revealed that equitable guidelines are in place for the posting of athletic banners in the school's gym. It was recommended that these guidelines be expanded to include equitable provision of athletic awards and postseason banquets. (See <i>KHSAA Recommended Action</i> .) According to the data submitted in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$18 per female athlete and \$21 per male athlete for awards.
Support Services		X	The 2001 Title IX school visit report deemed this benefit category <i>Satisfactory</i> . The 2009 report rendered it <i>Deficient</i> . This report documented an apparent lack of institutional control over booster spending. Information gathered during the most recent school visit revealed that the school has active athletic booster clubs supporting boys basketball, girls basketball, football, boys soccer, girls soccer, softball, and baseball. All these booster clubs house their funds outside of school accounts. There are written and signed agreements with all existing booster clubs that specify extensive control over fundraising activities but little control over booster club expenditures. The Internal Analysis Summary for the 2013-14 annual Title IX report shows that 40% of athletic expenditures were for female athletes who made up 47.5% of participants while 60% of athletic expenditures were for male athletes who made up 52.5% of participants or approximately \$344 per female athlete

Support Services continued			and\$464 per male athlete. The Internal Audit Summary for the 2014-15 annual report shows that 39% of athletic expenditures were for females who made up 46% of the participants and 61% of athletic expenditures were for males who made up 54% of participants or approximately \$336 per female athlete and \$460 per male athlete. These calculations show that total athletic spending was slightly outside of generally accepted parameters for the provision of parity for a football-playing school during two consecutive school years. It was discussed with school officials that this disparity appears to be in the area of <i>Equipment and Supplies</i> . (See the T-35 form in the 2014-15 Title IX annual report.) School officials contended, during the visit, that the disparity in this area may be the result of either inaccurate or incomplete reporting of expenditures on the T-35 forms. Because of this disparity in spending as submitted to KHSAA and the fact that there remains little, if any, direct institutional oversight of booster spending, this benefit category continues to be deficient. (See <i>KHSAA Recommended Action</i> .)
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:

- establishment of a female weight room;

- general maintenance procedures at the gym, soccer field, and softball field;
- investigation of the interest in bass fishing;
- upgrading the track and tennis courts;
- construction of a press box at the softball field.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The one deficiency designated in the body of this report is related to the submittal of and institutional oversight of expenditures for athletic benefits. (See **Support Services** and *KHSAA Recommended Action*.)

There were also two areas of concern listed in the report in relation to:

- development of equitable written guidelines for the provision of athletic awards and postseason athletic banquets—see *Publicity* and *KHSAA Recommended Action*.
- development and implementation of equitable written guidelines for the provision of travel and per diem—see *Travel and Per Diem Allowances* and *KHSAA Recommended Action*.

7. KHSAA Recommended Action in relation to new deficiencies

Although not currently designated to be deficient, the following areas of concern are to be addressed in an attempt to insure a continuation of the provision of equitable benefits.

**Travel and Per Diem Allowances**—On or before March 1, 2016, the school is to submit to KHSAA an expansion of the current regulations for travel and per diem which addresses the mode of transportation (school/charter bus, board-owned vans, etc.) and parameters for equitable provision of meals and lodging for student athletes.

**Publicity**—On or before March 1, 2016, the school is to submit to KHSAA written guidelines which address the provision of parity in relation to athletic awards and postseason banquets.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

- It appears that the school has successfully addressed the deficiency in **Accommodation of Interests and Abilities** that was assessed as a result of the Title IX school visit on December 1, 2009. Evidence offered during the most recent visit gives strong indication that the standard established in Test 3 for provision of athletic opportunities is currently being met.
- It appears that the deficiency designated in the area of **Medical and Training Facilities and Services** as a result of the December 1, 2009 Title IX school visit has been successfully addressed by the construction of a new weight training facility for females only at the school's athletic complex. This venue has numerous training options which are very suitable for female athletes.

- **Support Services**—This benefit category was deemed deficient as a result of the December 1, 2009 Title IX school visit and continues to be rated as deficient as a result of the most recent Title IX school visit on November 2, 2015.
  - The school's annual Title IX report submitted to KHSAA on or before April 30, 2016 is to contain complete and accurate expenditures in all categories on the T-35 form.
  - On or before March 1, 2016, the school is to submit to KHSAA all written regulations for the oversight of booster club spending for the provision of parity which are in place at the school. This information may include copies of any documents that are used as part of this process.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jerry Taylor, 1014 S. Dixie Hwy., Munfordville, KY 42756  
(270) 524-2332

District Level Title IX Coordinator: Steve Caven, 25 Quality St., Munfordville, KY 42756  
(270) 524-2631

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Kaylie Butler	Student Athlete	(270) 524-2332
Jon Lawler	Student Athlete	(270) 524-2332
Mary Ann McCoy	Girls Basketball	(270) 524-2332
Neil Logsdon	Girls and Boys Golf/Tennis	(270) 528-1682
William Belt	Board Member	(270) 524-2332
Jerry Taylor	Athletic Director	(270) 524-9347
Angela Craddock	Girls Volleyball/Basketball	(270) 774-1819
Steve Caven	District Title IX Coordinator	(270) 528-7972
Greg Cecil	Principal	(270) 524-2332
Kathy Johnston	KHSAA	(859) 494-2509

10. Comments

No one from the community attended the Public Comments session. School officials were complimented for the improvements that had been made in the provision of equitable opportunities and benefits since the December 1, 2009 school visit. The meeting was adjourned at 3:10 pm CST.