



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

**(For schools re-visited during the 2012-2013 school year)**

School: Knott County Central  
 Prepared By: Gary W. Lawson  
 Date of Re-Visit: December 5, 2012  
 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 data submitted, the school has met the standard established in Test 1 for provision of athletic opportunities during each of the past three years. There appears to be some problems with submittal of accurate information on team rosters. The rosters submitted in the 2011-12 annual report show the school has no girls or boys cross country teams and 40 varsity participants on the volleyball team.

- 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: According to information submitted, the school has not met the standard established in Test 2 for provision of athletic opportunities during any of the past three school years. The 2011-12 annual report shows that no teams for either gender at any level have been added 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 T-3 forms for the past two years indicate that the standard established in Test 3 is being met, the information found in the most recent student athletic interest survey do not support these responses. The indicated interests in bowling (31 girls) and girls soccer (36) must be pursued for authenticity before this standard can be met.

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 found on the T-63 form, the school received a 97% return rate on its 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 school was rated <i>Satisfactory</i> in provision of opportunities in the April 30, 2002 school visit report. At that time, the data indicated that the standard established in Test 1 for the provision of athletic opportunities was being met. The November 3, 2001 report deemed the provision of opportunities to be <i>Deficient</i> because it appeared the school was not meeting the standard established in any of the three tests. Annual reports for the past three years indicate that the standard established in Test 1 is being met. THE TEAM ROSTERS SUBMITTED IN THE 2011-12 ANNUAL REPORT APPEAR TO CONTAIN SIGNIFICANT ERRORS. School officials were reminded that a <u>comprehensive evaluation can only be made based on an accurate accounting of participants</u>. The school's T-3 forms also imply that Test 3 is being met. Unfortunately, the responses on the T-3 forms are not supported by the information in the most recent student athletic interest survey. This survey shows significant interests in bowling and girls soccer. The T-3 or T-60 forms show <u>no evidence of any steps taken to ascertain the validity of either of these indicated interests</u>. A KHSAA representative reviewed the most recent Title IX improvement plans. These plans appeared to address relevant challenges but there was some question concerning the degree of follow up and implementation provided. The school's Title IX file was reviewed. It was found to contain both the previous Title IX school visit reports, copies of annual reports submitted to KHSAA for the past five years, a board-approved extra service pay schedule for coaches, a listing of the members of the current Gender Equity Review Committee, game schedules for all school sponsored sports, written usage schedule for shared athletic facilities, written guidelines for the posting of banners in the gym, written designation of the locker room and athletic storage space assigned each team, sign-in</p>

Accommodation of Interests and Abilities  continued			sheets and agendas for all Gender Equity Review Committee meetings for the past three years. <u>School officials were requested to keep written minutes with these agendas in the future.</u> The file also contained a written uniform review, rotation, and/or replacement plan, and written guidelines relating to travel and per diem (see <i>Travel and Per Diem</i> ). School officials were commended for the development and maintenance of a comprehensive Title IX file.
Equipment and Supplies	X		Both the 2002 and 2004 Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The uniforms and equipment inspected during the most recent visit appeared to be of high quality. The quantity of uniform items supplied appeared to slightly favor female athletes. The review of the Title IX file showed that a uniform review, rotation, and replacement plan was in effect. This plan is based on a three-year cycle of review. The coaches interviewed seemed knowledgeable of the current plan. According to the data submitted in the 2011-12 annual report, the school was spending approximately \$262 per female athlete and \$406 per male athlete for equipment and supplies. This spending appears to be outside of generally accepted parameters for the provision of parity. (See <i>Support Services</i> .)
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . According to information gathered during the most recent visit, the number of competitive events scheduled for teams of "like" sports was comparable. The school's shared practice facilities appeared to be assigned equitably. The practice schedules found in the Title IX file documented parity in these assignments. KHSAA representatives discussed with school officials the need to provide equity in relation to the scheduling of opportune playing times for all student athletes.
Travel and Per	X		The April 30, 2002 and the November 3, 2004

<p>Diem Allowances</p> <p>Travel and Per Diem Allowances</p> <p>continued</p>			<p>school visit reports stated that this benefit category was <i>Satisfactory</i>. The school's Title IX file contained written guidelines for equitable provision in relation to mode of transportation and meals. UPON RECEIPT OF THIS REPORT, IT IS REQUESTED THAT THESE GUIDELINES BE EXPANDED TO INCLUDE EQUITABLE PROVISION OF MOTEL ROOMS. According to information in the school's 2011-12 annual report, approximately \$81 per female athlete and \$187 per male athlete was spent for travel and per diem. These figures apparently favor male athletes. (See <i>Support Services</i>.)</p>
<p>Coaching</p>	<p>X</p>		<p>This benefit category was deemed <i>Satisfactory</i> as a result of the two earlier school visits. The data in the 2011-12 annual report submitted to KHSAA shows that the total amounts expended for coaches' salaries are comparable. A review of the school district's extra service pay schedule showed parity. The annual report indicates that the number of coaches provided for teams of "like" sports was equivalent. Information gathered during the visit revealed that 75% of the head coaches of boys teams and girls teams are off-campus employees.</p>
<p>Locker Rooms, Practice and Competitive Facilities</p>	<p>X</p>		<p>The 4-30-02 school visit report rendered this area <i>Deficient</i> stating that a large disparity existed in relation to amenities provided at the softball complex compared to other outdoor facilities. The 11-03-04 report deemed this area <i>Satisfactory</i> describing the construction of a new softball complex with increased amenities. This venue was superior in almost every way when compared to the previous softball facility. The review of facilities during the most recent visit showed all competitive venues were well maintained and provided with equity in mind. A new, very aesthetically appealing tennis complex that serves both boys and girls teams had been constructed since the 2004 visit. All the locker room space at both the indoor and outdoor facilities seems to be provided equitably. This school has more athletic equipment storage space than is</p>

			usually seen. All this space appears to be assigned equitably. Since the original school visit in 2002, the school has made much progress in relation to equity of provision in this benefit category.
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<p>Medical and Training Facilities and Services</p>	<p>X</p>		<p>Both the previous Title IX school visit reports rated this category <i>Satisfactory</i>. The November 3, 2004 report did state that it appeared that female athletes were not using the weight training facilities on a regular basis. The most recent visit revealed that the school has two weight training rooms. One is located adjacent to the football dressing room and is for use of that team only. The other weight training room is near the gym and is for all other teams. The school's Title IX file contained an equitable usage schedule for the shared weight training room. This schedule was also posted at the facility. The shared training room contained equipment that was suitable for use by female athletes. Interviews with students and coaches indicated that female athletes had access to a significant amount of training equipment that was not housed in the weight room. The school does not provide access to an athletic trainer for either gender. During the "Back to School Bash" that is held on a designated day each fall, free physical examinations are provided by local physicians for any student athlete.</p>
<p>Publicity</p>	<p>X</p>		<p>The April, 2002 school visit rated this benefit category <i>Deficient</i> stating that the selection and assignment process for cheerleaders had led to provision of inequitable support. The November, 2004 visit deemed this category <i>Satisfactory</i> noting the selection and assignment process for the school's two cheerleading squads appeared to be equitable. The most recent visit indicated that the school's one cheerleading squad cheers at an equal number of home games for football, boys basketball and girls basketball games. This situation is monitored by the athletic director to insure parity. The pep band performs at all home football, boys basketball, and girls basketball games, and the dance team performs at an equal number of boys and girls basketball games which is also monitored by the athletic director. The school has written guidelines for the posting of athletic recognition banners in the gym. There are no</p>

			athletic awards banquets or athletic achievement awards provided by the school at this time.
Support Services		X	The April, 2002 school visit report rendered this benefit category <i>Satisfactory</i> but did list concerns relating to both accurate reporting and lack of administrative oversight of athletic expenditures. This category was <i>Satisfactory</i> according to the 2004 report which stated that school officials were now requiring all booster funds be deposited in school accounts and purchase orders be used for all athletic expenditures. The most recent visit showed that the same policies are currently in place for monitoring booster spending. An analysis of athletic spending over the past three years showed that this spending, as submitted by the school, is outside acceptable parameters for the provision of parity on both a percentage and per athlete basis. After some in depth analysis and discussion with school officials, it became apparent that, at least part of this disparity, is caused by the inaccurate submittal of the number of participants on the team rosters. Because a significant disparity has existed on school submittals for three consecutive years, this benefit category must be deemed <i>Deficient</i> . (See <i>KHSAA Recommended Action in relation to new deficiencies</i> .) KHSAA representatives discussed with school officials the accurate counting of participants, the proper submittal of team rosters, and generally recommended methods of monitoring athletic spending for provision of equity.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		

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

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



- establishment of feeder programs for softball and volleyball;
- continued monitoring of athletic expenditures for provision of parity;
- establishment of a middle school track program.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The one major deficiency designated by this visit is in the benefit category of *Support Services*. The deficiency may be directly related to the inaccurate submittals of team rosters or a lack of proper monitoring of athletic spending, or a combination of these factors. (See *KHSAA Recommended Action*.) There are also two “areas of concern” that need to be addressed in an attempt to avoid the development of future deficiencies. (See *Accommodation of Interests and Abilities* and *Travel and Per Diem* in the body of this report.)

7. KHSAA Recommended Action in relation to new deficiencies

(Support Services) In order to address the current deficiency in this benefit category, the school is requested to conduct a self-analysis of athletic spending by following the steps designated below.

Between April 1, 2013 and April 8, 2013, the school’s athletic director and principal are to check all team rosters placed on the KHSAA web site for accuracy.

Between April 8, 2013 and April 15, 2013 the school’s athletic director and principal are to complete a T-35 and T-36 form for the 2012-13 school year containing 2011-12 expenditures. These administrators are to calculate per athlete expenditures for males and females based on the number of athletes on the corrected rosters and the expenditures on the T-35 and T-36 forms.

If the per athlete expenditures in this analysis are outside acceptable parameters (i.e. more than \$100 per athlete in favor of males), a written plan for addressing this disparity shall be submitted to KHSAA no later than April 25, 2013. This plan should include, but not be limited to, the benefit area(s) to be addressed and the specific team(s) to be targeted in order to bring this spending within generally accepted parameters.

The school’s April 30, 2012 annual report to KHSAA should also contain the results of expenditure analysis. Steps taken to address any disparities should also be a part of the April 30, 2013 Title IX improvement plan (T-60).

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The documentation submitted by the school indicates that the deficiency designated in the area of *Accommodation of Interests and Abilities* has been addressed. The school has met the standard established in at least one of the three tests for provision of athletic opportunities during each of the past three years. SCHOOL OFFICIALS ARE CAUTIONED THAT TWO OF THE TESTS ARE TOTALLY DEPENDENT UPON ACCURATE REPORTING OF PARTICIPANTS ON TEAM ROSTERS. THE SCHOOL MUST VALIDATE THE AUTHENTICITY OF INDICATED ATHLETIC INTERESTS IN ORDER TO MEET THE STANDARD OF TEST 3.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Cavanaugh Trent, 76 Patriot Lane, Hindman, KY 41822  
(606) 785-3153

District Level Title IX Coordinator:Cavanaugh Trent, 76 Patriot Lane, Hindman, KY 41822  
(606) 785-3153

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Cavanaugh Trent	Athletic Director	(606) 785-3153
Robert C. Pollard	Principal	(606) 785-3166
David Adams	Teacher/Parent	(606) 785-3153
Kathy Johnston	KHSAA	(859) 494-2509

9. Comments

10. No one from the community attended the Public Comments session. The meeting was adjourned at 3:30 pm EST.