



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

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

School: Lyon County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: September 28, 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 not met the standard established for Test 1 for provision of athletic opportunities during any of the past three school years. The 2014-15 annual Title IX report showed that 52% of the student enrollment was female while 47% of the school's athletic participants were females.

- 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 in the annual Title IX reports indicate that the school has not met the standard established for Test 2 for provision of athletic opportunities during any of the past three school years. The T-2 form submitted in 2014-15 shows that a total of five teams for female participation have been added during the past five years. These additional teams have increased the current rate of female participation by 20%.

- 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 and data submitted on the T-3 forms indicate that the standard established for Test 3 for provision of athletic opportunities has been met during each of the past three school years. The responses given by the school on the T-3 form appear to be supported by the information found in the most recent student athletic interest survey. The T-2 form shows that the school currently offers 11 total teams for female participation and 12 total teams for male participation.

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

Comments: According to the information provided on the T-63 form in the 2013-14 annual Title IX report, 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 November 21, 2002 school visit report rated this area <i>Satisfactory</i> because it appeared the school was meeting the standard established for Test 1 for provision of athletic opportunities. The October 20, 2011 visit again resulted in a <i>Satisfactory</i> rating. The report stated that it seemed the school was meeting the standards established for both Tests 1 and 3 for provision of athletic opportunities. Annual reports submitted to KHSAA for the past three years give strong indication that the standard of Test 3 is currently being met. The school has apparently added the sports deemed necessary by the student athletic interest survey. (See detailed explanation of each of the three opportunities tests on page 2 of this report.) It was revealed during this review that there was the possibility of errors on the team rosters submitted to KHSAA. <u>School personnel were reminded that accurate rosters are now the sole basis of the total Title IX evaluation. IT IS INCUMBENT UPON THE SCHOOL TO TAKE EVERY MEASURE TO INSURE ACCURACY IN THIS ENDEAVOR.</u> During the recent visit, the school's 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, an extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, current game schedules for all school-sponsored varsity teams, facilities usage schedules for the gym, soccer field, and the weight training room, written guidelines for posting of banners and pictures, and the equitable provision of letters, bars, and awards. (See <i>Publicity</i>.) The file also contained a written designation for the locker room and athletic equipment storage space assigned all teams except girls and boys cross country and girls and boys track. (See <i>Locker Rooms, Practice and Competitive Facilities</i> and <i>KHSAA Recommended Action</i>.) Also found in</p>

Accommodation of Interests and Abilities continued			the file were minutes from all Gender Equity Review Committee meetings held during the past three years, a plan for review and/or replacement of uniforms (see <i>Equipment and Supplies</i> and <i>KHSAA Recommended Action</i>), some written regulations for provision of travel and per diem (see <i>Travel</i> and <i>Per Diem</i> and <i>KHSAA Recommended Action</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). School officials were encouraged to continue to work toward the development of a comprehensive Title IX file.
Equipment and Supplies	X		Both the 2002 and the 2011 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The 2011 report documented that the school had a uniform review/rotation plan based on a four-year cycle. The most recent school visit revealed that there is a written plan for replacing uniforms every four years but this plan did not include girls and boys' tennis, girls and boys' golf, girls and boys track, or girls and boys cross country. Information provided during the interviews indicated that these uniforms are purchased by the individual student athletes and are usually replaced annually. (See <i>KHSAA Recommended Action</i> .) All uniforms and equipment reviewed during the visit were of mid-to-high quality and seemed to be supplied in equitable quantities. Data submitted in the 2013-14 and 2014-15 annual Title IX reports indicate that the school spent approximately \$107 per female athlete and \$119 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports designated this benefit category <i>Satisfactory</i> . Information gathered during the most recent visit indicated that the number of competitive events scheduled for teams of "like" sports was comparable. Facility usage schedules which showed equitable access were provided for the gym, soccer field, and the weight training room. The school also has an indoor hitting facility for baseball and softball. One half of the building is set up for baseball and the other

Scheduling of Games and Practice Time continued			half is set up for softball. This venue can be used by both teams at the same time if necessary. 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 November 21, 2002 school visit report rendered this benefit category <i>Satisfactory</i> but did mention an apparent disparity in relation to meal allotments for student athletes. The October 20, 2011 report again rated this category <i>Satisfactory</i> stating that the school's Title IX file contained equitable guidelines for travel and per diem which included specific meal allotments for student athletes. The most recent review showed that the regulations continued to appropriately address equitable provision of meals but did not adequately address the equitable provision of the mode of transportation. There was no discussion of vehicles used other than school buses and no stipulations related to lodging for student athletes. Spending within this benefit category could not be evaluated because the submitted expenditures on the T-35 form were incomplete in the travel column. The failure to provide adequate guidelines for provision of the mode of transportation and lodging for student athletes and failure to provide total and accurate expenditures for this category render this category to currently be deficient. (See <i>KHSAA Recommended Action</i> .)
Coaching	X		Both the previous Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The school's principal is responsible for evaluating all head coaches. A written instrument is not currently used as part of this process. A review of the district's extra service pay schedule for coaches seemed equivalent. According to the data submitted on the T-35 form in the 2014-15 annual Title IX report, the total amounts spent for coaching salaries for teams of "like" sports showed parity. The information provided in the 2014-15 annual Title IX report shows that the coaching ratio for both male and female teams was one coach for every 11 participants. Information gathered

			during the visit revealed that 86% (6/7) of the head coaches of both the boys and girls teams were on-campus employees.
Locker Room, Practice and Competitive Facilities	X		School visits in 2001 and 2007 resulted in <i>Satisfactory</i> ratings for this benefit category. The tour of facilities during the most recent visit showed that the athletic venues were very similar to those described in the 2011 report. The boys and girls basketball teams play and practice in the high school gym. The girls and boys tennis teams share two unlighted courts located on the school campus and two lighted courts in the city park located about one mile from the school. The boys and girls golf teams practice and compete at Mineral Mounds State Park located approximately four miles from the school. The track teams practice behind the elementary school, but all meets are scheduled at other schools. The baseball, softball, and soccer teams practice and play at Lee S. Jones Park located about a mile and a half from the school. These venues are very well maintained and offer excellent amenities. The baseball and softball fields appear equitable in all aspects. The lists in the school's file, as well as the facilities tour, revealed that all teams are provided locker room and equipment storage space except <u>girls and boys cross country and girls and boys track. It is strongly recommended that all teams be provided these benefits.</u> (See <i>KHSAA Recommended Action</i> .) Coaches of boys and girls basketball are the only ones who are provided office space.
Medical and Training Facilities and Services	X		The 2002 school visit report rated this benefit category <i>Satisfactory</i> but stated that the school's weight training room did not appear to meet the conditioning and rehabilitation needs of its students. The 2011 report again rated this category <i>Satisfactory</i> and noted that the school had an equitable usage schedule for the weight training room in the Title IX file, but the schedule was not posted at the facility. The most recent school visit revealed that the school now has a small but very well maintained and well equipped weight training room located in the main school building. This center provides numerous equipment options

<p>Medical and Training Facilities and Services continued</p>			<p>that are suitable for use by female athletes. There was an equitable usage schedule for this venue in the Title IX file and posted at the facility. A team physician is available at all boys and girls basketball games and at all boys and girls soccer matches. Athletic training services are not currently provided. Two local physicians provide free athletic physical examinations for any student on a designated day during June.</p>
<p>Publicity</p>	<p>X</p>		<p>Both previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The 2002 report requested that equitable written guidelines be developed for the posting of various forms of athletic recognition. The 2011 report documented that guidelines had been developed for the posting of banners and some other forms of recognition. This 2015 visit revealed that the school has one cheerleading squad that cheers at all home games and at all away boy/girl doubleheader games for both the boys and girls basketball teams. The band performs at all home boy/girl doubleheader games. A local radio station broadcasts all home and away games for both the boys and girls basketball teams. The Title IX file contained equitable regulations for the posting of banners and pictures and the provision of letters, bars, and awards. It is requested that upon receipt of this report, these <u>GUIDELINES BE EXPANDED TO INCLUDE THE EQUITABLE PROVISION OF POST SEASON BANQUETS</u>. According to data submitted in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$7 per female athlete and \$5 per male athlete for awards.</p>
<p>Support Services</p>	<p>X</p>		<p>The school visit reports from 2002 and 2011 both rated this benefit category <i>Satisfactory</i>. According to interviews with administrators and coaches during the most recent visit, the school currently has athletic booster clubs that support softball, baseball, boys and girls basketball (joint), and boys and girls soccer (joint). These clubs all house their funds off the school campus. As a means of oversight, the</p>

Support Services continued			school requires the use of a purchase order approved by the athletic director for all booster purchases. According to the Internal Analysis Summary for the 2013-14 annual Title IX report and the Internal Audit Summary for the 2014-15 annual Title IX report the school's athletic expenditures appeared to be within generally accepted parameters for the provision of parity for a non-football playing school. <u>It must be noted that the travel and per diem expenditures used in these calculations were not accurate.</u> (See <i>Travel and Per Diem.</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:

- investigating the feasibility of starting an archery team, girls volleyball, and junior varsity girls soccer program;
- investigating ways to stimulate interest in the fast pitch softball program.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The one deficiency designated as a result of the September 28, 2015 Title IX school visit was in the benefit category of *Travel and Per Diem Allowances*. The school's failure to develop adequate guidelines for provision of equity and failure to provide full disclosure of expenditures resulted in this deficiency. (See *KHSAA Recommended Action*.)

There were also "areas of concern" listed in relation to:

- Development of a comprehensive uniform review, rotation, and/or replacement plan. (See *KHSAA Recommended Action*.)
- Development of equitable written guidelines for provision of post season awards banquets. (See *Publicity*.)
- Provision of equitable benefits in relation to locker rooms and equipment storage space. (See *KHSAA Recommended Action*.)

7. KHSAA Recommended Action in relation to new deficiencies

(Travel and Per Diem Allowances)

- On or before February 1, 2016, the school is to submit to KHSAA a written expansion of the current guidelines for Travel and Per Diem which include equitable provision in relation to all modes of transportation used by student athletes (i.e. school bus, board-owned vehicles, etc.) and equitable provision of lodging for student athletes during overnight trips.
- On or before February 1, 2016, the school is to submit to KHSAA a corrected T-35 form for the 2014-15 school year which reflects accurate and complete expenditures in the *Travel* column. (Note: This document will show expenditures for 2013-14.)

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

(Equipment and Supplies) On or before February 1, 2016, the school is to submit to KHSAA a written expansion of the current uniform review, rotation, and/or replacement plan which addresses uniform provision for boys' and girls' tennis, boys and girls golf, boys and girls track, and boys and girls cross country.

(Locker Rooms, Practice and Competitive Facilities) On or before February 1, 2016 the school is to submit to KHSAA an expansion of the listings of locker room and equipment storage space to include provision for both boys and girls cross country and the boys and girls track teams.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated in the October 20, 2011 Title IX school visit report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jeff Doom, 544 State Route 730 West, Eddyville, KY 42038
(270) 963-0357

District Level Title IX Coordinator: Jeff Doom, 544 State Route 730 West, Eddyville, KY 42038
(270) 963-0357

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Tyler Wilson	Student Athlete	(270) 388-9715
Melanie P'Poole	Student Athlete	(270) 388-9715
Emilee Workman	Girls Head Soccer Coach	(270) 388-9715
Zach Thomas	Boys Basketball/Tennis	(270) 388-9715
Russ Tilford	Superintendent	(270) 388-9715
Deanna Doom	Guidance Counselor	(270) 388-9715 Ext. 107
Carla Murphy	Parent	(270) 388-9715
Chris Putnam	Parent	(270) 388-9715
Jessica Dalbey	Tennis/Financial Officer	(270) 388-9715 Ext. 103
Jeff Doom	Athletic Director/Basketball	(270) 963-0357
	Title IX Coordinator	

10. Comments

was No one from the community attended the Public Comments Session. The meeting adjourned at 3:15 pm CDT.