



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

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

School: Sheldon Clark
 Prepared By: Gary W. Lawson
 Date of Re-Visit: November 28, 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
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 data submitted, this school has met the standard established in Test 1 for provision of athletic opportunities during each of the past three school years in relation to female athletes. There is close to a 50/50 split in participation for both genders.

- 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 data and 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 have been added for either gender 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: According to the responses on the T-3 form, the school has met the standard established in Test 3 for provision of athletic opportunities during each of the past three school years. The responses on the T-3 form have been supported by the information found on the student athletic interest survey. In order to continue to meet the standard, the school must attempt to validate the indicated interest in bowling (23 girls), bass fishing (24) and archery (55) during the current school year.

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 on the T-63 form, an 85% return 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 school was rendered <i>Deficient</i> in this category following the October 23, 2003 school visit. At that time the information indicated that the school was not meeting the standard established in any of the three tests for provision of athletic opportunities. In addition, the school had held <u>no</u> Gender Equity Review Committee meetings for the past year. At that time the school's Title IX improvement plan had inappropriate goals, and little, if any, follow up was shown. The November 16, 2004 visit report stated that the school appeared to be meeting the standard established in both Tests 1 and 2 for provision of athletic opportunities. During the most recent visit, an inspection of minutes indicated that three Gender Equity Review Committee meetings had been held during the past school year. School officials were commended for the vast improvement that had occurred. The data in the annual reports for the past three years indicate that the school is meeting the standard established in both Tests 1 and 3 for provision of athletic opportunities. IN ORDER TO CONTINUE TO MEET THE STANDARD ESTABLISHED IN TEST 3 THE INDICATED INTERESTS IN BOWLING, ARCHERY, AND BASS FISHING NEED TO BE VALIDATED DURING THE CURRENT SCHOOL YEAR. Documentation of this action should be found on the T-3 form and the T-60 form in the April 30, 2013 annual report. The most recent Title IX improvement plans submitted by the school were reviewed. These plans appeared to address the designated advantages submitted on the T-41 form. The school's Title IX file was reviewed by a KHSAA representative. It was found to contain the two previous Title IX school visit reports, the annual Title IX reports for the past five years, a board-approved extra service pay schedule for coaches, a listing of the members of the Gender Equity Review Committee, sample game schedules for all school sponsored sports, a football program which included recognition of all other fall sports, a</p>

<p>Accommodation of Interests and Abilities</p> <p>continued</p>			<p>girls and boys basketball program, a rather comprehensive athletic handbook, written facilities usage schedules for the gym, football/girls soccer field, and the weight training room, written guidelines regarding awards and recognition of athletic accomplishments (see <i>Publicity</i>), written designation of locker room and athletic storage space assigned each team, written agendas, minutes, and sign-in sheets for all Gender Equity Review Committee meetings held the past three years, a written uniform review, rotation, and/or replacement plan, and written guidelines relating to the provision of travel and per diem(see <i>Travel and Per Diem</i> and <i>KHSAA Recommended Action</i>). School officials were commended for the development and maintenance of a comprehensive Title IX file.</p>
<p>Equipment and Supplies</p>	<p>X</p>		<p>The 10/23/03 school visit report deemed this benefit category to be <i>Satisfactory</i>, but did state that an equitable uniform review, rotation, and/or replacement plan should be “developed and implemented.” The 11/16/04 report again rendered this category <i>Satisfactory</i> stating a uniform replacement plan was in effect based on a three-year rotation cycle. The uniforms and equipment reviewed during the most recent visit appeared to be of high quality and provided on an equitable basis. The Title IX file contained the uniform rotation plan mentioned above. Interviews indicated that both student athletes and coaches were familiar with the plan. According to information submitted in the 2011-12 annual report, the school was spending approximately \$178 per female athlete and \$352 per male athlete for equipment and supplies.</p>
<p>Scheduling of Games and Practice Time</p>	<p>X</p>		<p>The original 2003 report stated this category was <i>Deficient</i> primarily due to the school’s failure to provide “equivalence” in regard to opportune playing times for girls teams. The 2004 report rated this category <i>Satisfactory</i> and cited the increase in optimal playing times for female teams. A review of recent schedules posted on the KHSAA web site continues to</p>

Scheduling of Games and Practice Times continued			show parity in this endeavor. Information gathered during the most recent visit showed that the number of competitive events scheduled for teams of “like” sports was comparable. It also appeared that all practice facilities were assigned equitably. Practice schedules were provided for the gym as well as the girls soccer/football field.
Travel and Per Diem Allowances	X		Both the 2003 and 2004 school visit reports deemed this benefit category <i>Satisfactory</i> . The 2004 report stated that a written plan was in place for provision of equitable meal allotment. The most recent visit showed that guidelines for equitable provision in terms of transportation and meals for athletes were in place. <u>UPON RECEIPT OF THIS REPORT, THE SCHOOL IS REQUESTED TO EXPAND THESE GUIDELINES TO INCLUDE PROVISION OF MOTEL ROOMS.</u> Spending in this area could not be fully evaluated due to the school's submittal of what appeared to be inaccurate information on the T-35 and T-36 forms. The 2011-12 annual report showed that the school had <u>no expenditures</u> for football travel. It also showed that the girls basketball team spent <u>\$76,681 for travel and per diem.</u> School officials recognized several errors in this category during the visit. (See <i>KHSAA Recommended Action.</i>)
Coaching	X		Both the previous school visit reports rendered this benefit category to be <i>Satisfactory</i> . Information provided on the T-35 and T-36 forms showed that the total amounts spent for coaching salaries for teams of “like” sports is comparable. A review of the district's extra service pay schedule for coaches showed parity as did the number of coaches provided for teams of “like” sports except in the case of baseball (three coaches for one team) and softball (two coaches for two teams). School officials stated that this disparity occurred due to the late hiring of a softball coaching staff. KHSAA representatives were assured the situation was being addressed. Information

			gathered during the visit indicated that 29% of the head coaches of girls teams are off-campus employees compared to 38% of the head coaches of boys teams.
Locker Rooms, Practice and Competitive Facilities	X		Both the 2003 and the 2004 school visit reports deemed this benefit category <i>Satisfactory</i> . The 2003 report stated that there appeared to be a “lack of knowledge” among school administrators concerning the availability of dressing rooms and athletic equipment storage space. In 2004, there was a disparity in the amenities provided at the softball field compared to other outdoor competitive venues. The most recent visit revealed that the school has constructed a new softball and baseball complex at the nearby middle school. Both these facilities are very well appointed and offer similar amenities. They are a significant improvement over the facilities available at the time of the first two school visits. It was suggested to school officials that they attempt to have <u>safety guard on top of the outfield fence at the softball field.</u> Almost all locker rooms are shared and, these dressing areas seem to be assigned equitably. Athletic equipment storage space is apparently in short supply but does seem to be allocated equitably.

<p>Medical and Training Facilities and Services</p>	<p>X</p>		<p>Both previous school visits rated this benefit category <i>Satisfactory</i> while suggesting the services in this area were “very limited.” Inspection of the facilities during the most recent visit showed that the school had an adequate sized weight room that contained a significant amount of equipment suitable for use by female athletes. An equitable written usage schedule for the weight room was found in the Title IX file while a written designation of team use of the room (<u>without</u> scheduled times) was posted at the facility. <u>Upon receipt of this report, school officials are requested to post the schedule currently found in the Title IX file at the facility.</u> This schedule should be kept up to date in an effort to show that female access is provided. Training services are offered to all student athletes by one trainer supplied through a contract with Inez Physical Therapy and a full time staff member who is certified in athletic training. Athletic physical examinations are provided at no cost to all student athletes by local physicians during the summer.</p>
<p>Publicity</p>	<p>X</p>		<p>The October 23, 2003 school visit report rated this benefit category <i>Deficient</i> due to the fact that the cheerleader selection process appeared to create a situation in which more skilled cheerleaders supported the male teams. The November 16, 2004 report said that school officials had modified the selection and assignment process for cheerleaders in order to promote equity. The school currently has one cheerleading squad that cheers at all home and post season contests for football, girls basketball, and boys basketball. The pep band performs at all home football games and at an equal number of home boys and girls basketball games as monitored for equity by the principal. The mascot attends all post season games for football and boys and girls basketball. The school’s athletic teams do not have banquets or purchase athletic awards. On a designated day near the end of the school year, all the student athletes are transported to the local community center</p>

Publicity continued			where they have games, movies, food, etc. as a reward for their participation. Unfortunately, as was the case with travel and per diem, the expenditures in this category were not accurately reported on the 2011-12 T-35 and T-36 forms. (See <i>KHSAA Recommended Action</i> .) The school's Title IX file contained written guidelines related to provision of athletic recognition. These referred to the hanging of banners in the gym, induction into the Athletic Hall of Fame, and providing an Awards Day at the community center. It is recommended that upon receipt of this report that school officials <u>expand these guidelines to include the specific requirements for the recognition of individuals or teams on banners posted in the gym.</u>
Support Services	X		Both the previous school visit reports rendered this benefit category <i>Satisfactory</i> stating that the school had no active athletic booster clubs. A lot of amenities currently provided for athletes come from team fundraising. All fundraisers must be approved by the school council and monies earned in this way are placed in school accounts. All athletic expenditures are required to go through the purchase order process. A review of athletic spending for the past two years, <u>as submitted by the school</u> , showed that in 2010-11 expenditures favored female athletes on both a percentage and per athlete basis. (The T-35 and T-36 forms included capital construction costs for a new softball field.) In 2011-12, these expenditures favored male athletes mainly because the T-35 and T-36 forms included capital construction costs for a new baseball field. School officials were reminded that all expenditures should be closely monitored to insure that no disparity continues over a two-year period.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities	NA		

and Services			
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:

- monitoring travel and equipment expenditures for provision of equity;
- development of a feeder program for softball;
- construction of a concession stand to serve the baseball and softball fields.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the most recent school visit. There are some **areas of concern** in the categories of *Travel and Per Diem, Publicity, Locker Rooms, Practice and Competitive Facilities, and Medical and Training Facilities and Services* which need to be addressed in order for the school to continue to provide an equivalence in all benefit areas. (See the body of this report and *KHSAA Recommended Action*.)

7. KHSAA Recommended Action in relation to new deficiencies

No major deficiencies were designated as a result of the most recent school visit. The following areas of concern need to be addressed in order for the school to maintain its *Satisfactory* status.

(Travel and Per Diem) On or before February 18, 2013, the school is to submit to KHSAA T-35 and T-36 forms for the 2011-12 school year. (This document will include amounts and data for the 2010-11 school year.) This submittal is to contain correct and complete information in the column entitled Travel. The totals and percentages at the bottom of the T-36 form are to be re-calculated.

(Publicity) On or before February 18, 2013, the school is to submit to KHSAA T-35 and T-36 forms for the 2011-12 school year. (This document will supply amounts and data for the 2010-11 school year.) This submittal is to contain correct and complete information in the column entitled Awards. The totals and percentages at the bottom of the T-36 form are to be re-calculated to reflect the new data.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the November 16, 2004 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Robin Newsome, 1825 Blacklog Rd., Inez, KY 41224
(606) 298-3591

District Level Title IX Coordinator: Gregory Cornette, 1825 Blacklog Rd. Inez, KY 41224
(606) 298-3572

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Shawn Hager	Football Coach	(606) 298-3591
Darrin Rice	Girls Basketball	(606) 298-3591
Gregory K. Cornette	District Title IX Coordinator	(606) 298-3572
Robbie L. Fletcher	Principal	(606) 298-3591
Robin Newsome	School Title IX Coordinator	(606) 298-3591
Kathy Johnston	KHSAA	(859) 494-2509

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:20 pm EST.