



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

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

School: Union County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: December 14, 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
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 appeared to meet the standard established by Test 1 for provision of athletic opportunities during the 2014-15 school year. Verification is found on the T-1 form and on the Title IX Internal Audit Summary for 2014-15. The T-1 form in the 2014-15 annual Title IX report shows that females made up 44% of the athletic participants, and they were 46.7% of the school's 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 in the annual Title IX reports show that the standard established by Test 2 for provision of athletic opportunities was not met during any of the past three school years. The T-2 form in the 2014-15 annual report documents that two teams with 22 current participants have been added for females 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: The data and responses on the T-3 forms submitted in the annual Title IX reports give strong indication that the standard established by Test 3 for the provision of athletic opportunities has been met during each of the past three school years. The most recent T-63 form indicates there is little or no interest in sports teams not currently offered at the school. Documentation on the T-3 form in the annual reports show the steps being taken to validate the indicated interests in the sport activities of archery and bass fishing.

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 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 November 14, 2001 Title IX school visit report rated this category <i>Satisfactory</i> because it appeared at the time that the standard established by Test 2 for provision of athletic opportunities was being met. The December 15, 2009 school visit report also gave this area a <i>Satisfactory</i> rating stating that the school appeared to meet the standard established by Test 3. Annual Title IX reports for the past three years give indication that the standards established by Tests 1 and 3 are currently being met. In the case of Test 1, the 2014-15 annual report shows that the percentage of participation is within 2.6% of the percentage of enrollment for female athletes. In regard to Test 3, the most recent T-63 form indicates there is little or no interest in sports not currently offered at the school. Documentation on the T-3 form in the annual Title IX reports shows the steps being taken to address the indicated interest in the sport activities of archery and bass fishing. (See the detailed explanation for all three opportunities tests on page 2 of this report.) During the most 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, a board-approved 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, a school-generated athletic handbook for coaches, written facility usage schedules for the gym, weight training room and the soccer practice areas, written regulations regarding the posting of athletic banners, the retirement and display of athletic jerseys, the provision of athletic letters, bars, and trophies and post season banquets, and induction into the school's Athletic Hall of Fame. The file also contained written designation of the locker room and athletic equipment storage space</p>

Accommodation of Interests and Abilities continued			assigned each team, minutes from Gender Equity Review Committee meetings held the past three years, a plan for the equitable review and replacement of uniforms (see <i>Equipment and Supplies</i>), regulations regarding travel and per diem, and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445) School officials were commended for the development and maintenance of a very comprehensive and well organized Title IX file.
Equipment and Supplies	X		The 2001 Title IX school visit report deemed this benefit category <i>Satisfactory</i> but did request that an equitable uniform review, rotation, and/or replacement plan be developed. It was also noted that there was a difference in the quality of uniforms provided for softball compared to those for baseball. The 2009 school visit report rated this category <i>Satisfactory</i> and documented that the uniforms provided were comparable, and the school had a uniform rotation plan based on a three-year cycle. The most recent visit revealed that the school continues to have a uniform review plan based on a three-year cycle of rotation for all teams except girls and boys tennis and girls and boys golf which have their shirts replaced annually. Upon receipt of this report, the uniform review, rotation, and/or replacement plan is to be amended to show that tennis and golf uniforms are replaced yearly. All uniforms and equipment reviewed during the visit were of mid-to-high quality and appeared to be supplied in equitable quantities. According to data submitted in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$172 per female athlete and \$163 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The 2009 report did document that <u>no written usage schedules were available for the shared athletic facilities</u> . During the most recent visit, the Title IX file contained facility usage schedules showing parity for all shared athletic venues (gyms, practice areas for soccer, and the weight training room). A review of the

Scheduling of Games and Practice Time continued			team's athletic schedules as posted on the KHSAA web site show the number of competitive events scheduled 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 2001 and 2009 Title IX school visit reports designated this category <i>Satisfactory</i> . The 2009 report stated that the spending amounts submitted for this category were "questionable" and the written regulations provided were "limited." The most recent review revealed that the school had equitable written guidelines addressing the mode of transportation (school bus or van), and the provision of meals and lodging for student athletes. The spending amounts submitted for this category in the two most recent annual Title IX reports appear to be credible. The submittals in these two reports show that the school was spending approximately \$93 per female athlete compared to \$86 per male athlete for travel and per diem.
Coaching	X		Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The school's athletic director and principal are responsible for the evaluation of all head coaches. A written instrument is currently being used as part of this endeavor. A review of the district's extra service pay schedule for coaches indicated parity. The total amounts spent for coaching salaries for teams of "like" sports appears comparable according to the T-35 form in the 2014-15 annual Title IX report. This report also showed the coaching ratio for male athletes is one coach per seven participants and the ratio for females is one coach per ten participants. These numbers indicate a male advantage in terms of accessibility to coaching. Information gathered during the most recent visit revealed that 57% (4/7) of the head coaches of girl's teams and 22% (2/9) of the head coaches of boys teams were on-campus employees.

Locker Room, Practice and Competitive Facilities	X		<p>The 2001 Title IX school visit report rendered this benefit category <i>Satisfactory</i> but stated that the softball field was in need of upgrading and general maintenance and that there was concern about the condition of the practice field provided for girls soccer. The 2009 report also deemed this category <i>Satisfactory</i> and documented that the softball field was being renovated. The press box was not completed and the new scoreboard had not been installed. The report also noted that there was <u>no written documentation of the locker room assignments</u> for student athletes. Information from the review of the Title IX file during the most recent visit revealed that the school has written designation of both locker rooms and athletic equipment storage space assigned to each school sponsored team. The school currently has six indoor locker rooms—three of which are shared by all girls teams and three others shared by the boys teams. These locker rooms seem to be assigned equitably and offered equivalent amenities for all “like” teams. All available equipment storage space appeared to be assigned equitably and in relatively close proximity to the teams’ practice and/or competitive venues. The tour of facilities indicated that the recommended improvements and upgrades have been made at the softball facility. These improvements include:</p> <ul style="list-style-type: none"> • addition of a well-appointed press box; • installation of an updated scoreboard; • dugout upgrade; • improved field maintenance. <p>All other outdoor and indoor competitive facilities appear to show equivalence in relation to their amenities. <u>School officials were commended for vast improvement in the provision of parity within this benefit category.</u></p>
Medical and Training Facilities and Services	X		<p>The 2001 Title IX school visit report designated this benefit category <i>Satisfactory</i> but documented two gender related needs. There was a need for a posted usage schedule for the weight training room showing equitable</p>

<p>Medical and Training Facilities and Services continued</p>			<p>access and a need for equipment in the weight training room that was more suitable for use by female athletes. The 2009 Title IX school visit report deemed this category <i>Deficient</i> stating that there still was no usage schedule for the weight training room, and there was a “very limited” amount of equipment that was suitable for use by female athletes. The most recent visit revealed that the school has a large and very well equipped weight training room. There is a vastly increased number of training options for female athletes. There was also a usage schedule showing equitable access in the Title IX file and posted at the facility. An athletic trainer is provided daily on an equitable basis for all student athletes through a contract with Methodist Hospital of Union County. Student athletes are responsible for getting their own physical examinations. School officials were commended for taking positive steps to address the deficiency in this benefit category reported in 2009.</p>
<p>Publicity</p>	<p>X</p>		<p>Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2009 report documented that there appeared to be some errors and omissions in the submittal of expenditures in this category. The school currently sponsors one varsity cheerleading squad which cheers at all home and away varsity football games. They also cheer at all home boys’ basketball and girls basketball games and at away games versus district opponents for both teams. The full band plays at all home football games. The pep band plays at ten home games for the boys’ basketball team and 10 home games for girls’ basketball team. The dance team performs at all home football games and at every other home boys and girls basketball games. The Step team performs at the home girls and boy’s basketball games when the dance team does not perform. A local radio station broadcasts an equal number of baseball and softball games, all home and away football games, and the state wrestling tournament. The Title IX file contained detailed written guidelines for the provision of parity in regard</p>

Publicity continued			to posting of athletic banners, retirement of jerseys, allocation of letters, bars, and trophies, induction into the school's athletic hall of fame, and the provision of post season banquets. <u>The school failed to show the amount of spending for athletic awards for baseball, softball, girl's tennis, boys tennis, girls track and boys track on the T-35 form. The omission of these expenditures made it impossible to calculate per athlete spending for this benefit category.</u> (See <i>KHSAA Recommended Action.</i>)
Support Services	X		The 2001 Title IX school visit report deemed this benefit category <i>Satisfactory</i> . The 2009 report rated this category <i>Deficient</i> because there appeared to be inaccurate and incomplete expenditure totals submitted in several of the benefit columns on the T-35 form. The lack of accuracy made a complete evaluation of this category impossible at that time. Although there may be a slight problem with the amount submitted with the amounts for awards on the most recent T-35 form, the total expenditures appear to be more accurate and complete than those evaluated during previous Title IX school visits. The school currently charges an <u>athletic fee of \$25 per athlete per sport</u> . The fee is used only to help offset transportation costs. The school currently has booster clubs that provide support for all school sponsored teams. Some of these clubs house their funds within school accounts while others house their funds in local banks. There appears to be little, if any, administrative oversight of spending by booster clubs with off-campus accounts. It was emphasized to school officials that there is a need to implement a system for monitoring booster expenditures and to insure equitable benefits for all student athletes. The Internal Analysis Summary for 2013-14 annual Title IX report shows that 41% of athletic expenditures were for females who made up 38% of the participants and 59% were for male athletes who made up 62% of participants or approximately \$829 per female athlete and \$720 per male athlete. The Internal

Support Services continued			Audit Summary for the 2014-15 annual Title IX report shows that 41% of athletic expenditures were for females who made up 44% of the participants and 59% of the expenditures were for male athletes who made up 56% of participants or approximately \$547 per female athlete and \$626 per male athlete. Over the two-year period of evaluation, this spending appears to be within generally accepted parameters for the provision of parity for a football-playing school.
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 an attempt to balance spending in the area of *Travel and Per Diem*.

It should be noted that the above item is the only one submitted on the T-60 form in the last three annual reports.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the December 14, 2015 Title IX school visit.

There were **areas of concern** mentioned in relation to:

- development of an accurate uniform review, rotation, and/or replacement plan. (See *Equipment and Supplies*.)
- submittal of complete and accurate expenditures for awards on the T-35 form. (See *Publicity* and *KHSAA Recommended Action*.)
- implementation of a process for the oversight of booster spending for the provision of equitable benefits. (See *Support Services*.)

7. KHSAA Recommended Action in relation to new deficiencies

Although no deficiencies were designated in the body of this report, it is requested that the following area of concern be addressed in an attempt to insure the provision of equitable benefits.

(Publicity) The annual Title IX report, to be submitted to KHSAA no later than April 30, 2016, is to include complete and accurate expenditures in the **Awards** column on the T-35 form.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency designated in the area of *Medical and Training Facilities and Services* by the December 15, 2009 Title IX school visit report appears to have been successfully addressed by the significant improvement in the provision of weight training equipment that is appropriate for use by female athletes and the development of an equitable usage schedule for the weight training facility.

The deficiency in the area of *Support Services* designated by the December 15, 2009 Title IX school visit report appears to have been addressed by the accurate submittal of athletic expenditures in most of the benefit columns on the T-35 forms. (See *Publicity*.) The evaluation of athletic spending over the past two years appears to indicate parity for a football-playing school.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jeremy Tackett, 4464 U.S. Hwy. 60 W., Morganfield, KY
(270) 389-1454

42347

District Level Title IX Coordinator: Brian Lovell, 510 S. Main St., Morganfield, KY 42347
(270) 389-1694

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Morgan Heine	Student Athlete	(270) 389-1454
Jackson Oxford	Student Athlete	(270) 389-1454
David S. Curtis	Volleyball Coach	(270) 952-0962
Shane Smith	Basketball Coach	(270) 577-6034
Steven Carter	Assistant Superintendent	(270) 389-1694
Jeremy Tackett	Athletic Director	(270) 389-1454
Evan Jackson	Principal	(270) 389-1454
Nikki Conway	Softball Coach	(270) 389-1454
Terra Hancock	Guidance Counselor	(270) 389-1454
R. Nathan Tanner	Assistant Athletic Director	(270) 389-1454
Kathy Johnston	KHSAA	(859) 494-2509

10. Comments

No one from the community attended the Public Comments session. School officials were commended for their thorough preparation for the school visit. The meeting was adjourned at 3:20 pm CST.