



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

**(For schools re-visited during the 2011-2012 school year)**

School: Letcher County Central  
 Prepared By: Gary W. Lawson  
 Date of Re-Visit: November 14, 2011\*  
 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

Corrective Action 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

**\*Letcher County Central High School was not in existence during the period of original Title IX school visits by KHSAA. Therefore, this recent visit which is the subject of this report is actually an original Title IX visit and not a re-visit.**

- 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 and calculations submitted, the school has met the standard established in Test 1 for provision of athletic opportunities during each of the past three school years.

- 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 calculations submitted on the T-2 form, the school is not currently meeting the standard established in Test 2 for provision of athletic opportunities.

- 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 information submitted by the school indicates that the standard established in Test 3 for provision of athletic opportunities has been met during each of the past three school years. Information on the student athletic interest survey appears to support the responses given on the T-3 form.

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

Comments: Documentation submitted in the 2009-10 annual report indicates that an 83% 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 data, calculations, and responses submitted by the school indicate that the standards established in both Tests 1 and 3 for provision of athletic opportunities are currently being met. The school offers all KHSAA sanctioned sports for girls at the varsity level except swimming which does not seem to be geographically feasible at this time. There are a total of 14 team opportunities for female athletes and 15 total team opportunities for male athletes. KHSAA representatives reviewed the school's Title IX file. It was found to contain all the annual reports to KHSAA for the past five years, a board-approved salary schedule for coaches, a current listing of the members of the Gender Equity Review Committee, sample game schedules for all school sponsored sports, school sponsored seasonal (fall, winter, and spring) sports schedules for football, boys and girls basketball and baseball and softball, a school generated athletic handbook, written usage schedules for all athletic facilities that are shared, written guidelines regarding awards and recognition of athletic accomplishments for both genders, written designation of locker room space assigned to each team, written minutes for all Gender Equity Review Committee meetings for the past three years, and written guidelines relating to provision of athletic transportation which did not include provision of per diem. (See Travel and Per Diem and KHSAA Recommended Action). The file does <i>not</i> contain a written uniform review, rotation, and/or replacement plan. (See Equipment and Supplies and KHSAA Recommended Action.) The file also lacked a written assignment of designated equipment storage space for teams. (See Locker Rooms, Practice, and Competitive Facilities and KHSAA Recommended Action.) School officials were encouraged to continue to develop a comprehensive Title IX file.</p>

Equipment and Supplies	X		All uniforms and equipment reviewed during the visit appeared to be equitable in both quality and quantity provided. The school does not currently have a written plan for the equitable review, rotation, and/or replacement of uniforms. Interviews with coaches and student athletes indicated that although uniforms are replaced frequently, there is no system in place for an equitable cycle of rotation. (See KHSAA Recommended Action.) According to the data submitted on the 2009-10 and 2010-11 annual reports, the school was spending approximately \$96 per female athlete and approximately \$226 per male athlete for equipment and supplies. (See Support Services and KHSAA Recommended Action.)
Scheduling of Games and Practice Time	X		Information in the school's Title IX file showed that the number of regular season games scheduled by teams of "like" sports were comparable. The scheduling of all shared practice facilities appeared to be equitable. According to results posted on the KHSAA web site for the 2010-11 basketball season, the girls team played 40% (4/10) of their home games on prime dates. A review of posted game times indicated that prime time recommendations were also being met. The new KHSAA requirements for prime date play were discussed with the school's Gender Equity Review Committee.
Travel and Per Diem Allowances	X		According to data submitted in the 2009-10 and 2010-11 annual reports, the school spent approximately \$96 per female athlete compared to \$108 per male athlete for travel and per diem. The Title IX file contains written guidelines regarding the mode of transportation provided for student athletes. The current guidelines do not contain any stipulations related to per diem. (See KHSAA Recommended Action.)
Coaching	X		A review of the total amounts of money spent for coaching salaries for "like" sports shows equivalence on the 2010-11 annual report. The evaluation of the school's extra service pay schedule for coaches indicates parity. Overall, the number of coaches provided for "like" sports is comparable. Information given by

Coaching continued			school officials during the visit shows that 55% (5/9) of the boys teams head coaches are off campus employees compared to 87% (7/8) of the girls head coaches. Interviews with students during the visit suggested that coaches at the school make themselves very accessible to the athletes.
Locker Rooms, Practice and Competitive Facilities		X	<p>All practice and competitive venues seen during the recent visit reflect the school's commitment to having first rate facilities. The girls and boys golf teams, boys and girls soccer teams, boys and girls tennis teams, the wrestling team, and softball team all play at off-campus facilities that are well maintained. Transportation is provided for athletes. The on- and off-campus facilities for "like" sports all provide equivalent amenities for students with the exception of the baseball and softball facilities. The on-campus baseball facility has a large press box with a coaches' office, a home dugout with a small dressing room, and a batting cage adjacent to the field. The softball field is located approximately two miles from the school at the county park. The softball facility does not have a permanent press box, no coaches' office, and no dressing room. The softball team does have an indoor hitting cage at the school but not at the field. These disparities, along with the fact that the similar amenities provided at both fields seem to be of slightly higher quality at the baseball facility, result in this benefit category being deemed deficient. (See KHSAA Recommended Action.)</p> <p>The school does have a plan in place to begin construction of an on-campus softball field during the current school year. Discussions with school officials indicated that the plan specifies amenities at the softball field that will be comparable in quality to those currently at the baseball field. The visit revealed that all teams, except softball, are provided a dressing room. The shared dressing rooms appeared to be assigned equitably. The tour of facilities showed that athletic equipment storage areas are available for all teams except girls and boys cross country and girls and boys track. The interviews with coaches confirmed these needs although they are not likely to be a gender equity issue at this time. A listing of the</p>

			storage facilities provided was not found in the Title IX file. (See KHSAA Recommended Action.)
--	--	--	---

Medical and Training Facilities and Services	X		The school currently has two weight training rooms. One of the training areas is in the football field house and appears to be almost exclusively used by the football team. The second weight room located in the school building is apparently serves all other athletic teams. It contains equipment appropriate for use by female athletes. Information gathered during the visit indicated that the facility is used by some female teams, but no usage schedule was posted there. (See KHSAA Recommended Action.) Eastern Kentucky Physical Therapy provides training services at all home athletic events and Mountain Comprehensive Health Corporation offers free physical examinations for athletes on two days in July each year.
Publicity	X		The school sponsors one cheerleading squad. This squad cheers at all home and away and post season football games. They also cheer at all home and post season games for both the boys and girls basketball teams. The dance team is assigned to the same schedule as the cheerleaders. The pep band performs at all home and post season football games as well as all regular season home girls and boys basketball games versus district opponents and all post season tournament games for both teams. The Title IX file contained an excellent set of written guidelines regarding the provision of awards and recognition of athletic accomplishments. The posting of banners and pictures and the provision of awards and banquets were included in these guidelines. An evaluation of the spending for awards in this area could not be completed. The school's T-35 and T-36 forms in the 2010-11 annual report do not list any expenditures for awards for seven of the school sponsored teams.
Support Services	X		The provision of administrative support for coaches appears to be comparable for both genders. The school currently has no booster clubs, and all athletic expenditures are made through school accounts. School purchase orders are required to be used. An evaluation

<p>Support Services  continued</p>			<p>of spending for equitable provision of athletic benefits indicates that the school has been outside of acceptable parameters for providing parity on both a percentage and per athlete basis for at least five years. This evidence would seem to render this benefit category as deficient. It should be noted that Letcher County Central is only six years old, and athletic start up costs at a new school do not always show parity. Since the school did not have a Title IX audit at the time of the original school visits, no previous self analysis in relation to disparities in expenditures has been required. An evaluation of expenditures over the past two years shows that in 2009-10, 65% of the spending was for male athletes who made up 53% of the participants. Thirty-five per cent (35%) of the spending was for female athletes who made up 47% of the participants translating into approximately \$640 per male athlete compared to \$381 per female athlete—a difference of \$259 per athlete in favor of males. In 2010-11, 66% of the spending was for male athletes who made up 54% of the participants while 34% was spent on female athletes who were 46% of the participants. That means approximately \$714 per male athlete was spent compared to \$439 per female athlete which is a difference of \$275 per athlete that favored males. This review of two years of data indicates that the school is currently outside acceptable parameters on both a percentage and per athlete basis. In order not to be deficient in this benefit category, a self-analysis should be conducted to identify the specific benefit category(ies) and “like” teams to be addressed so these expenditures can be brought within acceptable boundaries to insure parity. (See KHSAA Recommended Action.)</p>
<p>Athletic Scholarships</p>	<p>X</p>		
<p>Tutoring</p>	<p>X</p>		
<p>Housing and Dining Facilities</p>	<p>X</p>		



and Services			
Recruitment of Student Athletes	X		

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

The school's most recent Corrective Action Plans call for the following:

- monitoring of athletic expenditures for the provision of equity;
- hiring assistant coaches for cross country and track;
- completion of written plans for an on-campus softball field.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

Only one major deficiency in the area of Locker Rooms, Practice and Competitive Facilities was designated during the recent visit. A specific focus of the deficiency was the amenities provided at the softball field compared with those at the baseball field. (See KHSAA Recommended Action in relation to new deficiencies.)

There were some "areas of concern" which need to be addressed to avoid future deficiencies. (See KHSAA Recommended Action in relation to new deficiencies.)

7. KHSAA Recommended Action in relation to new deficiencies

(Locker Rooms, Practice, and Competitive Facilities) Beginning on March 1, 2012, the school is to submit to KHSAA a progress report on construction of the new on-campus softball field. Reports are to continue every 90 days (i.e. June 1, 2012, September 1, 2012, December 1, 2012) until the facility is completed and ready for inspection by KHSAA. These reports should only include the progress or steps taken during the 90 day period since the last report.

The following "areas of concern" should be addressed in order to avoid the development of future deficiencies.

(Equipment and Supplies) On or before March 1, 2012, the school is to submit to KHSAA a written uniform review, rotation, and/or replacement plan which contains equitable review intervals for all "like" sports. This plan is to be shared with all coaches and the Gender Equity Review Committee and become part of the school's Title IX file.

(Travel and Per Diem) On or before March 1, 2012, the school is to submit to KHSAA an expansion of the current written guidelines for the provision of travel and per diem. The expansion is to include the oversight of provision of equitable parameters in relation to per diem.

(Locker Rooms, Practice, and Competitive Facilities) On or before March 1, 2012, the school is to submit to KHSAA a written listing of all athletic storage space assigned for each team at Letcher County Central. This listing should become a part of the school's Title IX file.

(Medical and Training Facilities and Services) On or before March 1, 2012, the school is to submit to KHSAA an equitable usage schedule for the weight room that is located in the school building. This schedule is to show provision of equitable access for all female athletes. It should be posted at the facility and also be placed in the Title IX file.

(Support Services) On or before March 1, 2012, the school is to submit to KHSAA a summary of a self analysis of athletic spending at the school. By using per athlete spending, this analysis should designate the benefit categories (i.e. equipment and supplies, travel, publicity, etc.) that are most in need of attention. Next, the school should designate the team expenditures within these categories that have shown significant disparities in benefits for "like teams". The third step will be to delineate the action(s) that will be taken by school administrators to monitor spending for the identified teams in the designated benefit categories in order to bring total spending within acceptable parameters for provision of parity. These steps should be included in the school's T-35 and T-36 forms as well as the Corrective Action Plan (T-60) that will be submitted to KHSAA by April 15, 2012.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

There were no prior deficiencies since the recent visit was the first to Letcher County Central.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Ozz Jackson, 932 Solomon Rd, Whitesburg, KY 41858  
(606) 633-5628

District Level Title IX Coordinator: Twyla J. Meser, 219 Yellow Mr. Rd., Leburn, KY 41831  
(606) 634-7549

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Ozz Jackson	School Coordinator	(606) 633-5628
Twyla J. Meser	District Coordinator	(606) 634-7549
Dickie Adams	Girls Bask'ball Coach/Teacher	(606) 481-5351
Haley Whitaker	Student Athlete	(606) 832-4844
Sally Hubbard	Girls Track/Cross Cntry Coach	(606) 633-2339
Faye Collier	Parent	(606) 832-6063
Greg Collins	Girls Soccer Coach	(606) 633-8419
Stephen Boggs	Principal	(606) 633-2339
Logan Johnson	Student Athlete	(606) 634-8481
Will Smith	Board Chair	(606) 633-0882

10. Comments

No one from the community attended the Public Comments Session. The meeting was adjourned at 5:25 pm EST.