



TITLE IX FINAL AUDIT REPORT

(For schools visited during the 2002-2003 school year)

School: **Atherton High School**
Reviewed By: **Martha Mullins**
Date of Visit: **January 14, 2003**
Telephone Number of Reviewer: **(859) 299-5472**

1. Completed Required Forms

GE-19 Yes No

Survey Student Interest Form Yes No

Summary Forms T-1 Through T-41 Yes No

Corrective Action Plan (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.) If Substantial Proportionality is chosen; does it appear that the school has performed the calculation correctly?

Yes No

(If No, include in comments section and analysis of what is incorrect in the calculation.)

Comment:
School personnel did not calculate double and triple counting correctly on Form T-1 in the original audit. In 2000-2001 and 2001-2002, they were calculated correctly.

B.) If History and Continuing Practice of Program Expansion are chosen; does it appear that the school has performed the calculation correctly?

Yes No

Comment:
Calculations were incomplete in the original audit. In 2001-2002, the calculations were complete and accurate.

C.) If Full and Effective Accommodation of Interest and Abilities is chosen, does it appear that the school provides opportunities in areas of students' interest?

Yes No

Comment:
The school includes all KHSAA-sanctioned sports and field hockey in its program. School personnel were advised to correct and place in school's permanent Title IX file Form T-3, nos. 2 and 3 with "yes" or "no", and to complete it for only the underrepresented sex.

3. **Has the school properly surveyed its student body to accurately assess the interests and abilities of its students?**

Yes No

Comment:

It was recommended to school personnel that grades 9-11 be surveyed, and that an effort be made to increase the percentage of surveys returned (70-75%, up from 67%).

4. Checklist of the Title IX Components of the Interscholastic Program

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		The school has had a 16% increase in girls' participation since the original audit was conducted. The school has met the requirements of Test 3.
Equipment and Supplies		X	There is no written policy on what athletic apparel can be purchased or how often. Teams are not supplied funds by the school for apparel and therefore athletes must purchase uniforms or raise funds to provide them. Uniforms for all sports were not available for review, therefore an accurate assessment of parity was not possible. Form T-5 was neither signed nor dated by most coaches. Laundry facilities are open to all teams. However, female players in basketball are asked to provide their own service while the coach of male players provides laundry service. It is not known whether or not this practice extends to other teams. It is recommended that the Gender Equity Review Committee review this matter.
Scheduling of Games and Practice Time	X		Fifty percent of home games in girls' basketball are scheduled in "prime time" in the 2002-2003 season. Form T-11 was not submitted from nine coaches making comparison with Form T-12 and T-13 difficult.
Travel and Per Diem Allowances	X		Meals provided earlier for football and boys' basketball have been discontinued. No food is provided for any sports team by the school or boosters.

Coaching	X		<p>Form T-17 for all sports was completed by the Athletic Director. On-site discussion, however, revealed no problem areas. Ratio of athletes to coaches was equitable, as were salaries.</p> <p>It is recommended that coaches co-sign Form T-17 to verify accuracy and for placement in the school's permanent Title IX file.</p>
Locker Rooms, Practice and Competitive Facilities		X	<p>Locker room assignments were equitable, as were storage areas. The area allotted boys' basketball overall was somewhat larger than that for other sports. Baseball field facilities were better designed and developed than the softball facility. The softball facility lacked dugouts, clear access to seating, a press box, and a scoreboard. Seating was placed neither behind the backstop nor along the baselines, making it less desirable for spectators. The space allotted for seating does not lend itself easily for expansion.</p> <p>There was no written schedule for use of either practice or competitive facilities. It was recommended that the Athletic Director's office maintain a schedule of the use of practice and competitive facilities, to be reviewed annually by the Gender Equity Review Committee.</p>
Medical and Training Facilities and Services	X		<p>Form T-28 for all sports bore the signature of the Athletic Director rather than that of the coach. There were several discrepancies between the T-28 forms and Forms T-29, T-30 and T-31 regarding which teams had the services of a student trainer. Field hockey was omitted from the forms. It was recommended that the forms be corrected and collated and placed in the school's permanent Title IX file.</p> <p>The weight room is well equipped with free weights. Most teams use the facility. It is recommended that coaches of girls' sports be polled to assure that the inventory of weights available is sufficient for use by female athletes. A schedule of daily use should be generated each sports season and posted and a copy kept in the office of the</p>

			Athletic Director.
Publicity	X		<p>The school has one cheerleading squad, which cheers for all varsity football and basketball games. It was recommended to school personnel that promotion of another girls' sport be initiated to better balance exposure for female athletes.</p> <p>Signatures and dates were omitted from many T-32 forms. Miscommunication between coaches and athletics administration resulted in many discrepancies in the data submitted on Forms T-32 and T-33. No deficiency was noted during the on-site visit. It was recommended that corrections and correlations be made and placed in the school's permanent Title IX file.</p> <p>It is recommended that a policy be generated by the Gender Equity Review Committee to be used as a guideline for hanging achievement banners in the gyms. The policy should become a part of the school's permanent Title IX file.</p>
Support Services		X	<p>Exact expenditures from all sources were not reported on Form T-35 and T-36 for 1999-2000 or 2001-2002.</p> <p>School personnel were advised to ensure that all athletes have access to coaches both on and off-season. Since girls' sports have more off-campus coaches, a means for providing female athletes with counseling opportunity needs to be established by school personnel. Form T-34 was not submitted or not signed by the majority of coaches.</p>
Athletic Scholarships**			N/A
Tutoring**	X		All students in the school have access to tutoring. It is recommended that each coach complete Form T-38 for placement in the school's permanent Title IX file.

Housing and Dining Facilities and Services **	X		See "Travel and Per Diem Allowances" above. It is recommended that each coach sign Form T-37 held in the school's permanent Title IX file under the Athletic Director's signature to verify accuracy.
Recruitment of Student Athletes**			N/A

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

School personnel were advised to carry over to the next school year any relevant item on Form T-60 that was not corrected by the timeline listed. Top Priority on the Corrective Action Plan for all three years of reporting was continued development of the softball field. All items have not been completed. (See Checklist Comments) in no. 4.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

More administrative oversight is suggested over booster participation. It is recommended that policies be developed on how outside funding is to be spent in order to better ensure benefits provided athletes are not skewed inequitably by gender. Also it is advised that the Gender Equity Review Committee generate policies which coincide with the school's philosophy of athletics on the number or types of awards to be given for recognition of individual athletes. Recommendations for development of other policies are listed in the Checklist Comments in no. 4.

7. Facility Recommendations or Concerns

By far the most pressing concern is the status of the softball field.

8. **KHSAA Recommended Action**

- Notify Office of Civil Rights and Request Federal Investigation of Possible Violations
- Notify Equity Division and KBE of Potential Title IX Violations
- Suspension from the Association
- Prohibition from Post Season Play
- Probation For
- Fine In The Amount of _____
- None at This Time
- School shall submit the following additional information:

(Equipment and Supplies)

School personnel shall submit Forms T-5, T-6, T-8, T-9 and T-10 applicable to the 2002-2003 school year by **April 15, 2003**. Data should reflect the actual inventory of athletic apparel per team rather than apparel issued per athlete. Any apparel purchased by the school shall be noted. Care should be taken to ensure that the full name of each sport, the coach's signature and the date signed are included on the forms. Blank forms can be obtained on the KHSAA website (www.khsaa.org).

(Scheduling of Games and Practice Times)

School personnel shall resubmit Forms T-11, T-12 and T-13 applicable to the 2002-2003 school year by **April 15, 2003**. Care should be taken to ensure accuracy of data, and that the full name of each sport, the coach's signature and the date signed are included on the forms.

(Practice and Competitive Facilities)

School personnel shall submit a progress report on plans for the development of the softball field as an attachment to the 2002-2003 Annual Title IX Report, due **April 15, 2003**. On Form T-60, Corrective Action Plan, the timetable for completion of the softball field complex and any future improvements planned shall be listed.

(Support Services)

School personnel shall submit complete and accurate Forms T-35 and T-36 for the 2001-2002 school year to the KHSAA office by **April 15, 2003**. All funds used to provide benefits to student-athletes shall be included.

To the extent information is available, Forms T-35 and T-36 for the 1999-2000 school year should be revised to include total funding and expenditures detailed by category and placed in the school's permanent Title IX file.

School personnel shall resubmit Form T-34 from all coaches applicable to the 2002-2003 school year by **April 15, 2003**.

(Selection of Cheerleaders) On or before **April 15, 2003**, the school is requested to provide information to the KHSAA concerning the manner in which cheerleaders are selected for boys' and girls' teams. If cheerleaders are selected in such a way as to result in arguably better (i.e. "A" team vs. "B" team) cheerleaders performing at boys' events, the school shall also submit a plan under which cheerleaders of equal ability shall perform at an equal number of boys' and girls' games in comparable sport (i.e., boys' varsity and girls' varsity basketball game).

(Prime Time Contest/Girls' Basketball) On or before **April 15, 2003**, the school is requested to provide information to the KHSAA concerning the number of "prime time" games scheduled (games to be played on Friday and/or Saturday nights) for its girls' varsity basketball team during the 2001/2002 season. To the extent that a fewer percentage of girls' games are played during prime times (when compared with the percentage of boys' games scheduled for prime times), the school shall advise the KHSAA of action it intends to take to immediately correct the difference.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Robert Peters

District Level Title IX Coordinator: James Watkins

Name	Title	Telephone
Robert Peters	Athletic Director	502-485-8732
Pat Cantwell	School Counselor	502-485-8730
Gary Lawson	KHSAA	502-875-3817
Martha Mullins	KHSAA	859-269-3394

10.

Comments

School personnel should clear up all missing or ambiguous data found in the original audit document submitted for the 1999-2000 school year. This document serves as a basis for continued monitoring of progress towards compliance with Title IX and should be kept in the office of the principal, with a suggested copy filed with the District Title IX Coordinator.

Form GE-19:

- a. Student-athletes and coaches should be included as potential members of the Gender Equity Review Committee
- b. There should be a meeting of the Gender Equity Review Committee scheduled for each sport season: fall, winter and spring.
- c. It is the opinion of the KHSAA that a reflection of the desired composition of a Gender Equity Review Committee was not present at the audit visit.

The public meeting scheduled for 6:00 pm did not materialize.