



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

**(For schools re-visited during the 2010-2011 school year)**

School: Bellevue High School  
 Prepared By: Martha Mullins  
 Date of Re-visit: February 10, 2011  
 Telephone Number of Reviewer: **(859) 299-5472**  
 Reviewed By: **Darren Bilberry, Asst. Commissioner**

1. Completed Required Forms

Verification of Forms (Form GE-50) Yes  No

Participation Opportunities Summary Chart (Form T-70) Yes  No

Benefits Summary Charts (Forms T-71 & T-72) Yes  No

Benefits Publicity (Form T-73) Yes  No

Corrective Action Plan Summary Charts (Form T-74) 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: Over the past five academic years the school has met this standard twice.

- 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: Over the past five academic years the school has met this standard twice.

- 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: Over the past five years the school has met this standard twice.

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

Comments: Due to the size of the student body, the fielding of teams in golf and cross country has varied for boys and girls according to their expressed interest at the time.  
There has been a steady decline in girls' participation over the last five years, from 155 in 2005-2006 to 128 in 2009-2010 (approximately twenty percent). During the same interval participation by boys has increased from 149 to 194, or thirty percent. It is conceivable that inaccurate data may have been reported on annual Title IX reports during this period of time. The Gender Equity Review Committee was advised to examine the trend for evidence of gender bias.

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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 met the standards for compliance with Title IX for the 2010-2011 school year
Equipment and Supplies	X		Uniforms appeared to be of the same quality for both genders. In the original visit report, the lack of volleyball practice uniforms was noted. However, currently, no teams have practice uniforms.  No discrepancies were found in the allotment of equipment. Clarification was given regarding the requirement to report the cost of donated equipment on the annual Title IX report Storage space was available for all teams.
Scheduling of Games and Practice Time	X		The school has met the requirement for scheduling girls' home basketball games for 2010-2011.  No discrepancies were seen in the scheduling of games or practice time.
Travel and Per Diem Allowances	X		Board of Education policies on mode of transportation are in place. Provision and/or allotment of per diem, including lodging, during regular season play should be clarified and standardized. In the original visit report an allotment of five dollars per athlete was listed. Current practice appears to be a mix of booster or parental groups underwriting meals and/or athletes paying for their own.
Coaching	X		Coaches' salaries are based on both past experience at the school and a standardized stipend. No bias was found.  The ratio of coaches to student-athletes was one to eight in the boys' program, and one to ten in girls' sports. A disadvantage for female athletes was noted due to the fact that five of the six head coaches are employed off-

			campus during the school day. Only one head coach of boys' teams is in that category.
Locker Rooms, Practice and Competitive Facilities		X	<p>No discrepancies were found in the provision of locker rooms or dressing areas for boys and girls. However, school personnel were advised to assign space for tennis and golf athletes to dress.</p> <p>There has been no observable progress made on the provision of an adequate softball field since the original visit seven years ago. The field currently in use serves as the school's practice football field. The outfield area overlaps a portion of a track facility without safeguards for practices or competition. Fencing for the field is incomplete, making the boundaries somewhat arbitrary. There are no dugouts, only benches. When compared to the provision of a field for the like-sport of baseball there is no question that it is an inferior venue.</p> <p>All other sports have acceptable facilities for play.</p>

Medical and Training Facilities and Services		X	<p>A certified professional is under contract to be on campus daily to provide services to all athletes. The facility is accessible to both females and males.</p> <p>The weight room on campus was not viewed as acceptable for all athletes. It was reported to be used primarily by the football team and as such is equipped more for those athletes than for female users. This observation was noted seven years ago during the original on-site visit.</p>
Publicity	X		<p>No printed publicity materials such as schedule cards, posters, or media guides are provided for any sport currently.</p> <p>Due to the size of the school, many of the cheerleaders are members of athletic teams as well. Two squads are formed at the beginning of basketball season taking this factor into consideration. The two groups were reported equivalent in skill level. Squads rotate when schedule conflicts arise.</p>

			<p>Cheerleaders perform for two boys' sports and for one girls' sport. School personnel were advised to define the role of cheerleaders more broadly as spirit leaders. As such, they could be encouraged to promote attendance at competitions for girls' sports other than basketball.</p> <p>Policies on awards and recognition of athletic achievement lacked sufficient detail to evaluate whether or not boys' and girls' teams are treated equally.</p>
Support Services		X	<p>Data reported on Forms T-71 and T-72 were inaccurate. Data requested were fiscal expenditures for the inclusive 2009-2010 school year, i.e. from July 1, 2009 to June 30, 2010.</p> <p>The school was reported to have one general booster club, however no signed agreement or other formal documentation was found in the permanent Title IX file. A sustainable structure for operation of a booster organization needs to be developed. Also needed is a more reliable framework for solicitation of donors and the accounting for gifts to the athletics program.</p> <p>Lengthy discussion was held with school administrators concerning the methods of reporting fiscal data on annual Title IX reports.</p> <p>All coaches have assigned office space. School personnel were advised to evaluate the means by which female athletes are able to contact coaches during the school day.</p> <p>A document outlining the duties and responsibilities of coaches has been developed to assist in their orientation. It is accompanied by an athletic policies and procedures manual providing guidance for general operations and practices.</p> <p>In most cases, policies and procedures contained in the school's permanent Title IX file lacked required signatures documenting final approval. In some instances, policy and actual daily practices were not aligned.</p> <p>A coach of a strictly girls' team should be added to the Gender Equity Review Committee.</p>

Athletic Scholarships	N/A		
Tutoring	X		All students have access to tutoring.
Housing and Dining Facilities and Services	X		Policy needs to be generated regarding meal or snack service provided before and/or after home competitions. (Policy regarding such service for AWAY competitions should be included in per diem policy.)
Recruitment of Student Athletes	N/A		

5. Brief Summary/Analysis of the Corrective Action Plan (Form T-74)

Focus was on the encouragement of girls' participation in sports. In terms of facilities, improvement of a venue for softball was paramount. Few actions were completed; none for the softball field.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

There has been a lack of adequate policy to guide the operation and gender equity oversight of the athletics program.

7. KHSAA Recommended Action in relation to new deficiencies

A) SUPPORT SERVICES—By May 16, 2011, school personnel will resubmit Forms T-71 and T-72 on the re-visit report with a proper listing of expenditure for the 2009-2010 fiscal year. (July 1, 2009-June 30, 2010.)

B) SUPPORT SERVICES—By May 16, 2011, school personnel will submit a copy of amended policies and procedures for the Bellevue athletics program which includes:

- 1) the structure of booster support and operation relative to the school's administration;
- 2) the framework for soliciting and accounting for gifts;
- 3) the provision of per diem, lodging, and meal service for competing athletes;
- 4) the criteria for lettering in each sport;
- 5) the provision of recognition events for athletic achievements, i.e. banquets;
- 6) the selection of cheerleaders and their assignment process;
- 7) the means by which student-athletes can be in contact with at least one member of their coaching staff on-campus during the school day.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

A) LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES—By May 16, 2011, school personnel will submit an outline of steps to be taken to provide a softball field commensurate with that for the baseball team by March 15, 2012. Signatures of the principal, superintendent, and school board chairperson must be included as a pledge to complete the project as a priority before funding any other high school capital projects for Bellevue athletics.

B) MEDICAL, AND TRAINING FACILITIES AND SERVICES—By May 16, 2011, school personnel will submit a schedule for weight training at alternate location(s) for teams not using the weight room currently. In addition, updating the current weight room should be placed as an item for correction on Form T-60 of the annual report, **with a definitive timeline for completion.**

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Nicholas Wilson

District Level Title IX Coordinator: Nicholas Wilson

Name	Title	Telephone
Nicholas Wilson	Athletics Director	859-630-4445
Don Swope	Board of Education, Member	859-582-9986
Tommy Sorrell	Girls' Basketball Coach	859-816-1853
Sally Wyatt	Cheerleading Coach	606-571-6059
J. Michael Wills	Principal	859-261-2980
Gordon Bocock	KHSAA Auditor	859-299-5472
Martha Mullins	KHSAA Auditor	859-299-5472

9. Comments

School personnel were prepared, cordial and cooperative throughout the re-visit. Uniforms for all sport teams were displayed. The permanent Title IX file was made available for review. (It was recommended that it be housed in the principal's office.) Meetings listed on the agenda were held on time with respective personnel attending.

In the past, partly due to the changeovers in athletics directors and coaches, reporting of information and financial data since the original on-site visit has been sketchy and incomplete. As noted earlier, considerable time was spent on clarifying expectations and requirements for accurate reporting on annual reports. Mixed and incomplete participation and financial data made thorough analysis difficult to accomplish. Policies and procedures that had insufficient detail or were limited in scope did not reflect practices that were disclosed or inferred in interviews or were observed on the tour of facilities.

The status of the school's weight room was discussed with school administration relative to size, appearance, and safety concerns.

The public meeting did not materialize.



**To: "Darren Bilberry, KHSAA" <dbilberry@khsaa.org>**  
**Subject: Copy: Title IX Re-Visit Audit Report Bellevue HS**  
**From: "Darren Bilberry, KHSAA" <dbilberry@khsaa.org>**  
**Date: Wed, 30 Mar 2011 11:36:12 -0400 (EDT)**

**Attachment: Bellevue H.S..doc**

Please find attached a copy of the KHSAA Title IX Re-Visit Final Audit Report for Bellevue High School that was conducted on February 10, 2011 visit by auditors Dr. Martha Mullins and Gordon Bocock. If you have questions or need additional information, please contact our office at your convenience. Thank you.

Darren Bilberry  
Assistant Commissioner  
Kentucky High School Athletic Association  
Telephone- 859-299-5472  
Fax: 859-293-5999  
E-Mail: [dbilberry@khsaa.org](mailto:dbilberry@khsaa.org)

# KHSAA Emailer

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select ademail as email_address,school as email_name from KHSAA_Schools,KHSAA.KHSAA_new_email_checked_schools where
KHSAA_Schools.id=KHSAA.KHSAA_new_email_checked_schools.id AND KHSAA_new_email_checked_schools.user="dbilberry@khsaa.org" AND
member="T" and (ademail is not null and ademail <> "") order by school
select prinemail as email_address,school as email_name from KHSAA_Schools,KHSAA.KHSAA_new_email_checked_schools where
KHSAA_Schools.id=KHSAA.KHSAA_new_email_checked_schools.id AND KHSAA_new_email_checked_schools.user="dbilberry@khsaa.org" AND
member="T" and (prinemail is not null and prinemail <> "") order by school
select superemail as email_address,school as email_name from KHSAA_Schools,KHSAA.KHSAA_new_email_checked_schools where
KHSAA_Schools.id=KHSAA.KHSAA_new_email_checked_schools.id AND KHSAA_new_email_checked_schools.user="dbilberry@khsaa.org" AND
member="T" and (superemail is not null and superemail <> "") order by school
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<p>Please find attached a copy of the KHSAA Title IX Re-Visit Final Audit Report for Bellevue High School that was conducted on February 10, 2011 by auditors Dr. Martha Mullins @ Gordon Bocock. If you have questions or need additional information, please contact our office at your convenience. Thank you.</p> <p>Darren Bilberry Assistant Commissioner Kentucky High School Athletic Association Telephone- 859-299-5472 Fax: 859-293-5999 E-Mail: dbilberry@khsaa.org</p>	

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