



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

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

School: Bethlehem  
Date of Visit: October 28, 2011  
Prepared By: Gary W. Lawson  
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: According to the data and calculations submitted by the school and corrected by KHSAA representatives, the school has met the standard established in Test 1 for the provision of athletic opportunities during one of the past three school years (2007-08) but is not currently meeting that standard.

- 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 by the school and reviewed by KHSAA representatives, the standard established in Test 2 for the provision of athletic opportunities has not been met during any of the past three school 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 data and responses submitted by the school, it has met the standard established in Test 3 for the provision of athletic opportunities during each of the past three school years and is currently meeting that standard.

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

Comments: Documentation submitted by the school indicates that an 81% 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>According to the data, calculations, and responses submitted by the school, it has met the standard established in Test 3 for the provision of athletic opportunities during each of the past three school years. The most recent student athletic interest survey appears to support the responses given on the T-3 form. The re-visit form indicates that the school is offering all KHSAA sanctioned sports for girls at the varsity level except golf. There are a total of 16 team opportunities for both male and female athletes. School officials were commended for the wide array of athletic offerings for the size of their school population. KHSAA representatives reviewed the school's Title IX file. It was found to contain the original Title IX audit report from February 25, 2003, all annual reports to KHSAA since 1999-2000, an approved salary schedule for coaches, sample game schedules for all athletic teams, a school-generated athletic handbook, written guidelines and oversight procedures for booster clubs, written usage schedules for all shared athletic facilities, written guidelines for earning bars and letters and the posting of banners for athletic recognition, a written designation of locker room space assigned each team, written minutes for all Gender Equity Review Committee meetings for the past five years, a written uniform review, rotation, and /or replacement plan, and written guidelines for the provision of travel and per diem. School officials were commended on the development and maintenance of a comprehensive Title IX file.</p>
Equipment and Supplies	X		<p>The February 25, 2001 audit report rated the school as satisfactory in this area but did request the school to develop a written uniform review, rotation, and/or replacement plan. The recent visit showed that plan had been developed and was based on a four-year rotation. The uniforms and equipment seen during the 2010 visit appeared to be of high quality and provided on an equitable basis.</p>

Equipment and Supplies (cont.)			According to the re-visit report and the 2009-10 annual report, the school was spending approximately \$101 per female athlete and approximately \$69 per male athlete for the provision of equipment and supplies.
Scheduling of Games and Practice Time	X		At the time of the February 25, 2003 visit, the school appeared to be meeting the minimum standard established for prime date and prime time play for girls basketball. According to the school's 2009-10 results posted on the KHSAA web site, 60% (6/10) of their home basketball games were played on prime dates. A review of posted game times showed that the standard established for prime time play was also being met. According to the re-visit report, the number of competitive events scheduled for "like" sports showed parity. The school visit revealed that the scheduling of shared practice facilities was equitable.
Travel and Per Diem Allowances	X		According to the re-visit report and the 2009-10 annual report, the school was spending approximately \$16 per female athlete and approximately \$14 per male athlete for the provision of travel and per diem. The school's Title IX file contained written guidelines for the provision of per diem which indicated equity.
Coaching	X		The February 25, 2003 audit report found this area to be satisfactory but encouraged school personnel to work to provide an equivalence of accessibility to coaches for both male and female athletes. According to the 2009-10 annual report, the number of coaches provided for "like" sports appeared to show parity. Based on the re-visit report, 12.5% (1/8) of the girls head coaches are employed on campus while 44% (4/9) of the boys head coaches are on-campus employees. <u>KHSAA representatives requested that the Gender Equity Review Committee consider this situation and attempt to implement any programs necessary in order to provide student athletes equal access to their coaches.</u> According to the re-visit form and the 2009-10 annual report, the total amounts of money expended for coaches' salaries for "like" sports is comparable. A review of the school's extra service pay schedule for coaches showed parity.

Locker Rooms, Practice and Competitive Facilities	X		<p>The February 25, 2003 audit report requested that the Gender Equity Review Committee address the issue of assigning locker room space for every athlete at the school. The recent visit revealed locker room space was equitably assigned. Unfortunately, this space is in very short supply. The school has two well appointed locker rooms in the gym—one for girls and one for boys—which are shared by all school sponsored teams except football. <u>It would appear that additional locker space is a significant need at the school.</u> School officials have done an excellent job of addressing the need for increased athletic storage space by acquiring the Saint Joe Prep Building and using a lot of this space for storage. All storage areas provided seem to be equivalent. The competitive facilities show parity in provision of amenities. Although not an equity issue at this time, <u>the need for more tennis courts is apparent.</u> The school currently has only two available courts for approximately 35 tennis participants.</p>
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Medical and Training Facilities and Services	X		<p>The February 25, 2003 report rated this category as satisfactory but requested that three items be addressed in order to bring about more equivalence. Those were: attempt to make the weight training room more user friendly; post an equitable facility usage schedule at the weight training facility; and insure that athletic physical examinations are provided on an equitable basis. The most recent visit showed that a new weight training/fitness center has been opened. The facility has state of the art equipment much of which is suitable for use by females. The fitness center has a posted schedule which allows equal access for female athletes. All student athletes are responsible for their own athletic physical examinations and have equitable access to a trainer through a contract with K.O.R.T.</p>
Publicity	X		<p>According to the re-visit form and the 2009-10 annual report, the school was spending approximately \$35 per female athlete compared to \$16 per male athlete for promotions/recognition, publicity, awards, and banquets. The school currently has one cheerleading squad that cheers at all home and post season games for football and boys and girls basketball. The cheerleaders also lead "spirit activities" for the boys and girls soccer and volleyball teams. The dance team performs at all home games for the boys and girls basketball teams.</p>
Support Services	X		<p>The February 25, 2003 audit report requested that the school's Gender Equity Review Committee monitor the amount of athletic spending in regard to the participation ratio for boys and girls. According to school officials, booster club support currently exists for almost all teams. School policy requires that all booster funds be housed in school accounts and that the spending of booster funds follows the purchase order process as is the case for other school funds. According to</p>

Support Services continued			documentation provided by the school for 2008-09, athletic spending was within acceptable parameters on a per athlete basis but slightly outside those parameters on a percentage basis. In 2009-10, spending was within acceptable guidelines on both a percentage and per athlete basis.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		

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

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

- increasing the number of girls basketball prime time games;
- upgrading the softball field;
- replacing soccer nets;
- installing recognition boards for swimming and track;
- adding a new weight room/fitness center;
- upgrading the gymnasium.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No deficiencies were designated in the overall athletic program by the recent school visit. Although not an equity issue at this time, it appears that additional locker room space is a need.

7. KHSAA Recommended Action in relation to new deficiencies

No new deficiencies were designated by the recent school visit.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated by the February 25, 2003 audit report.



9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Patty Nevitt, 309 W. Stephen Foster Ave., Bardstown, KY 40004  
(502) 348-8594

District Level Title IX Coordinator: Tom Brown, 309 W. Stephen Foster Ave., Bardstown, KY 40004  
(502) 348-8594

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 875-3817
Patty Nevitt	Assistant Athletic Director	(502)348-8594
Jane Sims	Girls and Boys Tennis Coach	(502)348-8594
Mike Willett	Booster Club Chairperson	(502) 460-2728
David M. Clark	Parent	(502) 348-4451
Belinda Monin	Parent	(502) 349-6714
Julia Wolf	Booster Club Chairperson	(502) 348-8594
Danny Russell	Girls Soccer Coach	(502) 348-8494
Celeste Dawson	Parent	(502) 348-8494
Tim Hurst	Boys Soccer Coach	(502) 348-8494
Susie Heil	Booster Club Chairperson	(502) 348-8494
Steve Heil	School Board Member	(502) 348-8494
Christi Medley	Golf Coach	(502) 348-8494
Angela Passafiume	KHSAA	(859) 299-5472

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 5:20 pm EST.

**To: "Darren Bilberry, KHSAA" <dbilberry@khsaa.org>**  
**Subject: Copy: - Bethlehem High School Title IX Re-Visit Final Audit Report**  
**From: "Darren Bilberry, KHSAA" <dbilberry@khsaa.org>**  
**Date: Wed, 15 Dec 2010 14:13:46 -0500 (EST)**

**Attachment: Bethlehem Re-Visit 2010.doc**

Please find attached a copy of the KHSAA Title IX Re-Visit Final Audit Report for Bethlehem High School that was conducted on October 28, 2010 by auditors Gary Lawson and Dr. Martha Mullins. If you have questions or need additional information, please contact our office at your convenience. Thank you.

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