



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

(For schools re-visited during the 2016-2017 school year)

School: Bethlehem
 Prepared By: Gary W. Lawson
 Date of Re-Visit: September 27, 2016
 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
	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: Information on the internal audit summaries for the 2014-15 and 2015-16 annual Title IX reports shows that the school has likely met the standard established by Test 1 for provision of athletic opportunities during each of the past two school years. The T-1 form in the 2015-16 annual report revealed that females were 44% of the school's enrollment, and they were 47% of the athletic participants.

- 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 to KHSAA indicates that the standard established by Test 2 for provision of athletic opportunities has not been met during either of the past two school years. The most recent T-2 form shows that the school has added three teams for girls during the past five years. The addition of these teams has increased the percentage of female participation by 24.8%. They have also added one team for male participation which has increased the percentage of participation by 14.5%.

- 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 school could not be granted credit for meeting the standard established by Test 3 for the provision of athletic opportunities because it appeared the results submitted for the 2015-16 student athletic interest survey were inaccurate. The form showed no interest for any sports/sport activities not currently offered by the school. (See the T-63 form in the 2015-16 annual Title IX report.)

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

Comments: Although an 83.8% completion rate was received on the most recent student athletic interest survey, it appears that the compilations for the sports/sport activities on the T-63 form are inaccurate.

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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>Both the February 25, 3003 and the October 28, 2011 Title IX school visit reports rated this category <i>Satisfactory</i>. At the time of both visits, the school appeared to be meeting the standard established for Test 3 for provision of athletic opportunities. Annual reports for the past two years give strong indication that the standard established by Test 1 is currently being met. <u>School officials were reminded that the T-63 submitted in the 2015-16 annual report was inaccurate.</u> (See <i>KHSAA Recommended Action</i>.) It seems likely that if the T-63 form (Student Interest Survey) were to be corrected, compliance with the standard established by Test 3 would be met. (See detailed explanation for opportunities tests on page 2 of this report.) During the most recent visit, the school's Title IX file was examined. It was found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five years, the district's 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, media guides for all sponsored teams, an athletic handbook for coaches and student athletes, written policies regarding the provision of support by athletic booster clubs, written facilities usage schedules for the gym and weight training room, written guidelines regarding awards and recognition of athletic accomplishments for both genders, documentation of locker room and athletic equipment storage space assigned each team, minutes for all Gender Equity Review Committee meetings held during the past three years, a written uniform review, rotation, and/or replacement plan, regulations regarding provision of travel and per diem, and a copy of the school's Athletic Facility Emergency Medical Plan. <u>School officials were highly commended for the development and maintenance of a comprehensive and well organized Title IX file.</u></p>

Equipment and Supplies	X		Both the previous school visit reports deemed this benefit category <i>Satisfactory</i> . At the time of the 2011 visit, the school had a uniform rotation/review plan based on a four-year cycle. The most recent visit revealed that the school has a written plan for replacing all uniforms every four years except for boys and girls golf, boys and girls swimming, and archery which are replaced each year. All the uniforms reviewed during the recent visit were of high quality seemed to be supplied in equitable quantities. The school currently has a contract with the Adidas Corporation for the provision of all team uniforms. According to information submitted in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$100 per female athlete and \$126 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both the 2003 and 2011 Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . According to information provided during the most recent visit, the number of competitive events scheduled for teams of “like” sports was comparable. Facility usage schedules showed equitable access for the gym and weight training room (venues shared by both genders). 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 two previous Title IX school visit reports designated this benefit category <i>Satisfactory</i> . Written guidelines addressing equitable provision in regard to the mode of transportation (school bus and charter bus), meals, and lodging for student athletes were found in the Title IX file. Interviews with student athletes and coaches gave strong indication that equity was pursued in relation to benefits within this category. According to information in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$42 per female athlete and \$71 per male athlete for

			travel and per diem.
Coaching	X		The 2003 and 2011 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The October 11, 2011 report stated that it appeared that the male athletes had a slight advantage in relation to accessibility of coaches. Information gathered for the most recent visit indicates that the coaching ratio for females is 12.1 participants per coach and the ratio for male athletes is 11.6 participants per coach. It was learned that 22% (2/9) of the head coaches of girls teams and 44% (4/9) of the head coaches of boys teams are on campus employees. The principal is responsible for the evaluation of all head coaches. A written instrument is not currently being used as part of this endeavor. A review of the extra service pay schedule for coaches indicated parity. A review of the T-35 form for 2015-16 indicated that the total amounts spent for coaching salaries for teams of “like” sports were comparable.
Locker Room, Practice and Competitive Facilities	X		<p>Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. As was the case at the time of the 2011 school visit, locker room space is in short supply, but all the available space seems to be assigned equitably. The school has done an excellent job of addressing the need for increased athletic storage space by using several areas in the Saint Joe Prep building which is adjacent to the school. All the assigned storage spaces appear to show equivalence. The competitive and practice venues are comparable except for the disparity which seems to exist in the amenities provided for softball when compared to those provided for baseball.</p> <ul style="list-style-type: none"> · The baseball dugouts have superior amenities. · The baseball team has an indoor hitting facility adjacent to their field—softball does not. · The baseball coach has an office while the softball coach does not. <p>School officials explained that property has been purchased and plans are being drawn up for a new athletic complex which will contain</p>

Locker Room, Practice and Competitive Facilities continued			new softball and baseball fields. According to school personnel, these venues will show equivalence in regard to amenities. (See <i>KHSAA Recommended Action</i> .) In total, the athletic facilities, as well as locker room and equipment storage areas appear to show equivalence.
Medical and Training Facilities and Services	X		The two earlier Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The most recent visit revealed that the school has a well-appointed weight training room. This facility offers numerous equipment options that are suitable for use by female athletes. There was an equitable usage schedule for this venue in the Title IX file and posted at the facility. All student athletes are responsible for their own physical examinations and have equitable access to a trainer through a contract with KORT.
Publicity	X		The 2003 and 2011 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The school currently has one varsity cheerleading squad that cheers at all home games and at away games versus district opponents for football and boys and girls basketball games. The school does not have a band or dance team at this time. A local radio station broadcasts selected home football and boys and girls basketball games. The athletic director monitors the games broadcasted in an effort to insure equity. There are recognition boards at the outdoor athletic complex and in the gym. These boards recognize both individual and team accomplishments. There are written policies in the Title IX file detailing the regulations for determining the accomplishments to be displayed on the boards. There are also written regulations in regard to the provision of letters, bars, awards, and post season banquets. Equitable guidelines are also in the file for induction into the school's Alumni/Athletic Hall of Fame. According to data submitted in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$14 per female athlete

			and \$32 per male athlete for awards. <u>These expenditures appear to substantially favor male athletes. Therefore, these benefits should be analyzed for provision of parity.</u>
Support Services	X		.The 2003 and 2011 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . Historically, athletic spending at Bethlehem has been within generally acceptable parameters for the provision of parity. The school currently has active athletic booster clubs for all school-sponsored teams except girls and boys cross country, girls and boys golf, girls and boys tennis, and girls and boys swimming. School policy requires that all booster bunds be housed in school accounts and that the purchase order process be adhered to when expenditures are made. The internal audit summary for the 2014-15 annual Title IX report shows that athletic spending for that year was within generally acceptable parameters for provision of parity. The internal audit summary for the 2015-16 annual Title IX report shows that 38% of the expenditures were for females who were 47% of the participants while 62% of the expenditures were for male athletes who were 53% of the participants. This translates into spending \$315.77 per female athlete and \$457.16 per male athlete for total athletic support. If the past two years are averaged together, per athlete spending for females is \$300.50 and per athlete spending for males is \$391.50. This is within generally acceptable parameters for a football-playing school.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of	NA		

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

The school's most recent T-60 forms call for the following:

- purchase pole vault/track equipment;
- provide a softball dressing room near the playing field;
- continue the increase in "optimal time" playing opportunities for females;
- increase the athletic equipment storage space for volleyball;
- install safety padding in gym.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the September 27, 2016 Title IX school visit.

The body of this report does document a few “areas of concern” in relation to:

- The submittal of complete and accurate information in regard to the results of the Student Athletic Interest Survey (T-63 form). (See *KHSAA Recommended Action*.)
- The provision of equitable amenities for the softball team when compared to those of baseball. (See *KHSAA Recommended Action*.)

IT SHOULD BE NOTED THAT BETHLEHEM HIGH SCHOOL HAS HAD THREE TITLE IX VISITS—2003, 2011, and 2016—AND HAS NOT BEEN REPORTED TO BE DEFICIENT IN ANY AREA. THE SCHOOL IS COMMENDED FOR CONTINUED PROGRESS IN RELATION TO EQUITABLE PROVISION OF OPPORTUNITIES AND BENEFITS FOR THEIR STUDENT ATHLETES.

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 “areas of concern” be addressed in an attempt to continue to provide equitable opportunities and benefits.

(Accommodation of Interests and Abilities)

On or before December 19, 2016, the school is to submit to KHSAA a corrected T-63 form on which accurate compilation of totals for each sport/sport activity is listed on this student interest survey document.

(Locker Rooms, Practice and Competitive Facilities)

- On or before December 19, 2016, the school is to submit to KHSAA a usage schedule for the indoor hitting facility which shows equitable access for the softball team.
- On or before December 19, 2016, the school is to submit to KHSAA a letter detailing the plans for the construction of new softball and baseball fields at the proposed athletic complex. This plan should contain documentation of the amenities provided at the baseball and softball fields as well as a projected completion date for the project.
- The school improvement plan (T-60 form) in the April 30, 2017 annual Title IX report is to include the steps being taken to provide equity in relation to office space for coaches of female and male teams.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated by the October 28, 2011 Title IX school visit 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: Keith Graham, 309 W. Stephen Foster Ave., Bardstown, KY 40004
(502) 348-8594

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Sarah Downs	Student Athlete	(502) 348-8594
Drew Werner	Student Athlete	(502) 348-8594
Shaun Smith	Softball Coach	(502) 348-8594
Danny Rossoll	Girls Soccer Coach	(502) 348-8594
Patty Nevitt	Assistant Athletic Director	(502) 348-8594
Keith Graham	Athletic Director	(502) 348-8594
Tom Hamilton	Principal	(502) 348-8594
Barbara Greenwell	Chief Finance Officer	(502) 348-8594
Connie McDowell	Parent/Teacher	(502) 348-8594
Susie Heil	Member at Large	(502) 348-8594
Steve Heil	School Board	(502) 348-8594
Celeste Dawson	Member at Large	(502) 348-8594
Christi Medley	Office of Advancement	(502) 348-8594
Erich Hoehler	Coach/Parent	(502) 348-8594

10. Comments

No one from the community attended the Public Comments Session. Ms. Nevitt, assistant athletic director, and Mr. Graham, athletic director, were commended for their thorough preparation for the school visit. The meeting was adjourned at 3: 20 EDT.