



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

(For schools re-visited during the 2014-2015 school year)

School: Bracken County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: September 26, 2014
 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: According to the data and rosters submitted in the annual Title IX reports, the school has met the standard established in prong 1 for provision of athletic opportunities during each of the past three school years. The T-1 form in the 2013-14 annual report shows that female students were 49% of the school's enrollment and 51.5% 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 data submitted indicate that the school has not met the standard established in prong 2 for provision of athletic opportunities during school years 2011-12 and 2012-13. The T-2 form in the 2013-14 annual report was submitted incorrectly. It showed all school-sponsored teams being added in the last five years which is not the case at Bracken County.

- 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: Because no evidence is shown on the T-3 form that the indicated interests in soccer (20 students) and bass fishing (29 students) have been addressed for validity, it is not likely that the standard established in prong 3 is being met.

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

Comments: According to the information provided on the T-63 form in the 2013-14 annual Title IX report, an 87% completion 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>Both the January 4, 2001 and the October 17, 2006 Title IX school visit reports designated this area <i>Satisfactory</i>. At the time of both visits, it appeared that the school was meeting the standard established in prong 1 for provision of athletic opportunities. The T-1 forms in the annual reports for the past three years continue to show that prong 1 is being met. It should be noted that the T-2 form in the 2013-14 annual report was submitted incorrectly. (See detailed explanation on page 2 of this report.) The school is also very close to meeting the standard of prong 3. The indicated interest in soccer should be pursued for validity. It is suggested that similar steps be taken in relation to bass fishing. During the recent visit, the school's Title IX file was reviewed. It was found to contain both previous Title IX school visit reports, all the annual Title IX reports submitted to KHSAA for the past five years, a board-approved 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 sports, facility usage schedules for the gym and the two weight training rooms (see <i>Scheduling of Games and Practice Times</i> and <i>KHSAA Recommended Action</i>), written guidelines regarding awards and recognition of athletic accomplishments (see <i>Publicity</i> and <i>KHSAA Recommended Action</i>), written designation of the locker room space and athletic equipment storage space assigned each team, minutes from Gender Equity Review Committee meetings held during the past three years, a uniform review, rotation, and/or replacement plan (see <i>Equipment and Supplies</i> and <i>KHSAA Recommended Action</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). School officials were commended for the development and maintenance of the Title IX file.</p>

Equipment and Supplies	X		<p>The 2001 school visit report rendered this benefit category <i>Deficient</i>. A major reason for this designation was the condition of the girls softball uniforms compared to those for male teams. The 2006 report deemed this category <i>Satisfactory</i> stating that the girls softball uniforms were of high quality and an equitable uniform review plan was in place. The most recent visit showed that the school had a uniform review, rotation, and/or replacement plan based on a four-year cycle of rotation for all sports. The current plan in the file <u>did not</u> show a full cycle of rotation for all sports. (See KHSAA Recommended Action.) Interviews with student athletes and coaches confirmed knowledge of and adherence to this plan. All the uniforms and equipment seen during the most recent visit was of high quality and appeared to be supplied equitably. All school uniforms are paid for according to the following formula—one-third by the board of education, one-third by the booster club, and one-third by the school's athletic fund. According to the information provided in the 2012-13 and 2013-14 annual reports, the school was spending approximately \$85 per female athlete and \$98 per male athlete for equipment and supplies.</p>
Scheduling of Games and Practice Time	X		<p>The 2001 school visit report rated this benefit category <i>Deficient</i> stating there was a disparity in the provision of opportune playing times for student athletes. The 2006 report rated this category <i>Satisfactory</i> documenting there was evidence that opportune playing times were provided for female athletes. Information obtained during the most recent visit showed that the number of competitive events scheduled for teams of "like" sports was comparable. There were schedules provided for all shared practice facilities that showed parity except for the indoor hitting facility shared by baseball and softball. (See <i>KHSAA Recommended Action</i>.) The scheduling of athletic events during the most opportune playing times was discussed with school officials who were encouraged to provide</p>

			equity in relation to all teams in this endeavor.
Travel and Per Diem Allowances	X		Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . At the time of the most recent visit, the review of the Title IX file showed that the school did not have any written guidelines for the provision of parity regarding travel and per diem. (See <i>KHSAA Recommended Action</i> .) According to information submitted in the 2012-13 and 2013-14 annual Title IX report, the school was spending approximately \$34 per female athlete and \$24 per male athlete for travel and per diem.
Coaching			This benefit category was deemed <i>Satisfactory</i> in both 2001 and 2006. Currently, the school principal and athletic director are responsible for evaluating all head coaches. There is no written instrument being used for this evaluation. Information on the T-35 form in the 2013-14 annual Title IX report shows that the total amounts spent for coaching salaries for teams of "like" sports was comparable. A review of the district's extra service pay schedule for coaches showed parity. After one correction was made on the school's 2013-14 T-35 form, it appeared that the number of coaches provided for teams of "like" sports was equivalent. It was explained to school officials that coaches being on-campus employees was a factor in assessing coaching accessibility. Information provided during the visit indicated that only 17% (1/6) head coaches of girls teams were employed on the school campus while 50% (3/6) of the head coaches of boys teams were on-campus employees.
Locker Rooms, Practice and Competitive Facilities	X		The 2001 and 2006 school visit reports rated this benefit category <i>Satisfactory</i> . The 2006 report noted numerous upgrades had been made at the girls softball field. The most recent visit showed that all locker rooms, practice and competitive facilities are well maintained. Written assignments for locker rooms and equipment storage space were made available

<p>Locker Rooms, Practice and Competitive Facilities continued</p>		<p>and confirmed by the tour of the facilities. At the time of this visit, some improvements had been made at the baseball facility. Students can walk on sidewalks or take the available bus to the softball field which is about one-half mile from the school. The amenities provided at the softball and baseball fields are comparable. Interviews with students and coaches did emphasize an issue that needs to be addressed. <u>The restrooms at the Bracken County Middle School adjacent to the softball field should be open and accessible to the players and public during games. Signs should be displayed to let the public know these restrooms are available.</u> The girls and boys track and cross country teams have dressing rooms and equipment storage areas at Taylor Elementary School which is about one-half mile from the high school campus. Their practice and competitive facilities are near the elementary school. All the locker rooms located at the high school are shared but appeared to be assigned equitably. The available equipment storage space also appears to be assigned in an equitable manner.</p>
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<p>Medical and Training Facilities and Services</p>	<p>X</p>		<p>Both the previous school visit reports judged this benefit category <i>Satisfactory</i>. The 2006 report noted that a new weight training room with updated equipment had been built. The school currently has two weight training rooms located in the building. Both facilities have written usage schedules that show female access. These schedules are in the Title IX file and posted at both facilities. Weight room #1 (referred to as the "new" weight room) has the most equipment that seems suitable for use by female athletes. Weight room #2 (the smaller room) has some female-friendly equipment, but most of the equipment is larger free weights. Interviews indicated that both weight rooms were accessible to female athletes, and some preferred #1 and while others chose to use #2. No athletic training services are currently provided at Bracken County High School. Physical examinations are available to any student athlete at Primary Plus Physicians for a \$15 fee.</p>
<p>Publicity</p>	<p>X</p>		<p>The previous two school visit reports rated this benefit category <i>Satisfactory</i>. The school currently sponsors one cheerleading squad that is assigned to cheer at all home and post season football games. They also cheer at all home games, all class "A" tournament games, and all post season games for both the boys and girls basketball teams. The full school band performs at all the same games as the cheerleading squad. The review of the Title IX file revealed that the school had guidelines in this area relating to the equitable posting of banners of recognition in the gym and the equitable provision of awards and trophies for all athletic performance. It is requested that these guidelines be expanded to include post season banquets. (See <i>KHSAA Recommended Action</i>.) According to information submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$11 per female athlete and \$16 per male athlete for awards.</p>

Support Services	X		This benefit category was rated <i>Satisfactory</i> by both earlier school visit reports. The 2006 report documented the need for administrative oversight in regard to booster club spending. The school currently has active booster clubs for all sports except archery and boys and girls tennis. These clubs are required to house their funds in school board accounts, and a board purchase order must be used for any spending of these funds. School and district officials were commended for the use of a very effective system of administrative oversight. An analysis of athletic expenditures for the past two years show that in 2012-13, the school was spending approximately \$425 per female athlete and \$477 per male athlete. In 2013-14, \$380 was spent per female athlete and \$482 per male athlete. Over this two-year period, athletic spending appears to be within generally accepted parameters for the provision of parity at a football playing school.
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 Title IX Improvement Plans call for the following:

- (2011-12) working with middle schools to begin a feeder program for girls soccer;
- (2012-13) improvement of facilities for "non-revenue" sports;
- (2013-14) upgrades to the softball field to be completed in 2015.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were assigned as a result of the September 26, 2014 school visit. There are some **areas of concern** within the categories of *Equipment and Supplies*, *Publicity*, *Travel and Per Diem*, and *Scheduling of Games and Practice Times* that the school is asked to address in an attempt to insure that an equivalence of benefits is provided.

7. KHSAA Recommended Action in relation to new deficiencies

Although no deficiencies were designated in the body of this report, the following categories should be addressed in order for the school to maintain a non-deficient status.

(Equipment and Supplies) On or before December 10, 2014, the school is to submit to KHSAA an expansion of the current uniform review, rotation, and/or replacement plan that shows a full cycle of rotation for all school sponsored sports. A copy of this expanded document is to become part of the school's Title IX file.

(Publicity) On or before December 10, 2014, the school is to submit to KHSAA an expansion of the current publicity guidelines that include the equitable provision of post season banquets. A copy of this expanded document is to become part of the school's Title IX file.

(Travel and Per Diem Allowances) On or before December 10, 2014, the school is to submit to KHSAA written guidelines for the equitable provision of Travel and Per Diem. These guidelines are to address the mode of transportation and the provision of meals and lodging. These guidelines are to become part of the school's Title IX file and the April 30, 2015 Title IX improvement plan submitted in the annual Title IX report.

(Scheduling of Games and Practice Times) On or before December 10, 2014, the school is to submit to KHSAA an equitable usage schedule for the indoor batting cage shared by softball and baseball. A copy of this schedule is also to be placed in the Title IX file.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated by the October 17, 2006 Title IX school visit report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Chad Persinger, 350 W. Miami St., Brooksville, KY 41004
(606) 735-3153

District Level Title IX Coordinator: Jeff Aulich, 348 W. Miami, Brooksville, KY 41004
(606) 735-2523

Name	Title	Telephone
Jacob Hamilton	Student Athlete	(606) 735-3153
Korbin Florer	Student Athlete	(606) 735-3153
Patrick Kelsch	Girls Basketball Coach	(606) 735-3153
Wade Smith	Girls Volleyball Coach	(606) 735-3153
Chad Persinger	Athletic Director	(606) 735-3153
Dennis Maines	Principal	(606) 735-3153
Jeff Aulich	Superintendent	(606) 735-2523
Larry "Scooter" Charles	Baseball Coach	(606) 735-3153
Mike Sizemore	Football Coach	(606) 735-3153
Carrie Jefferson	Teacher/Parent	(606) 735-3153
Kristi Clark	Teacher/Parent	(606) 217-1243
Gary W. Lawson	KHSAA	(502) 545-3393

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:15 pm EDT.