



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

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

School: Cordia  
 Prepared By: Gary W. Lawson  
 Date of Re-Visit: January 19, 2017  
 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
X	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 internal audit summary for the 2014-15 and 2015-16 annual Title IX report, the school has met the standard established by Test 1 for the provision of athletic opportunities during each of the past two school years. The 2015-16 audit summary shows that the girls percentage of participation is within 5% of the female percentage of enrollment. The school appears to meet the standard of subtest 3 of Test 1 for opportunities in regard to male athletes.

- 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 internal audit summary for the 2015-16 annual Title IX report shows that the standard established by Test 2 for provision of athletic opportunities is currently being met. The T-2 form in the most recent report shows that by adding two varsity teams (softball and track) for females during the past five years, the female percentage of participation has been increased by 59.5%. By adding one sport for boys (track) the percentage of male participation has been increased by 26.4%.

- 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 responses on the T-3 form along with information provided in the most recent student athletic interest survey gives strong indication that the standard established by Test 3 is being met. There does not appear to be any indicated athletic interests that the school has not addressed.

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

Comments: The T-63 form in the 2015-16 annual Title IX report shows that an 88.2% 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
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Accommodation of Interests and Abilities	X		
Accommodation of Interests and Abilities			<p>Both the February 27, 2002 and the January 26, 2011 Title IX school visit reports rated this category <i>Satisfactory</i>. The 2002 report based its rating on the fact that the school appeared to meet the standard established by Test 1 for provision of athletic opportunities. The 2011 rating was based on the evidence that the standards for both Test 1 and Test 2 were being met. Review of the most recent annual Title IX reports gives strong indication that the standards established by all three opportunities tests are currently being met. The recent Title IX internal audit summaries show that the minimum standards for Test 1 and Test 2 are being met for both male and female athletes. The addition of fast pitch softball and boys and girls track have been the major factor in the noted increase in provision of opportunities. In regards to Test 3, the responses on the most recent T-3 form appear to be supported by the information on the most recent student interest athletic survey. The administrators were complimented for the school meeting the standards of all three opportunities tests. During the most recent visit, the school's Title IX file was reviewed. It was found to contain the two previous Title IX school visit reports, annual Title IX reports 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 varsity teams, written facilities usage schedules for the gym, indoor hitting facility, and the weight training room, guidelines related to posting of banners, provision of awards and post season banquets, listing of assigned locker room and equipment storage space for each team, minutes for all Gender Equity Review Committee meetings for the past three years, listing of all recent uniform purchases (see <i>Equipment and Supplies</i> and <i>KHSAA Recommended Action</i>), regulations addressing equitable provision of per diem (see <i>Travel and Per Diem Allowances</i>), and a copy of the school's Athletic Facility Emergency Medical Plan. School officials were highly commended</p>

Continued			for the development and maintenance of a comprehensive and well organized Title IX file.
Equipment and Supplies	X		Both the previous school visit reports deemed this benefit category <i>Satisfactory</i> . The 2002 report requested the school to develop an equitable uniform review and replacement plan. The 2011 report documented that the school had developed what appeared to be an equitable plan. The most recent visit revealed that the school had a written listing of recent uniform purchases for all school sponsored teams. (See <i>KHSAA Recommended Action</i> .) All the uniforms reviewed during this visit were of mid-to-high quality and seemed to be supplied in equitable quantities. According to information submitted by the school in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$174 per female athlete and \$80 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		The 2002 and 2011 Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . According to information gathered during the most recent visit, the number of competitive events scheduled for teams of "like" sports was comparable. Facility usage schedules for the gym, weight training room, and the indoor hitting facility (venues shared by both genders) showed equitable access. The scheduling of competitive events during the most optimal playing times was discussed with school officials who were commended for the provision of parity in regard to this benefit.
Travel and Per Diem Allowances			The two earlier school visit reports rated this benefit category <i>Satisfactory</i> . It was documented at the time of both previous visits that the school did not have complete written regulations addressing the provision of parity in regard to mode of transportation or the provision of meals and lodging for student athletes. During the most recent visit, the school's Title IX file contained equitable guidelines regarding the provision of per diem (meals and lodging) for student athletes. UPON RECEIPT OF THIS REPORT, THESE
Travel and Per Diem Allowances			

continued			GUIDELINES ARE TO BE EXPANDED TO ADDRESS EQUITABLE PROVISION OF THE MODE OF TRANSPORTATION. Interviews with student athletes and coaches gave strong indication of equivalence in regard to this benefit. According to information submitted in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$228 per female athlete and \$180 per male athlete for travel and per diem.
Coaching	X		The 2002 and 2011 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The principal is currently responsible for the evaluation of all head coaches. A written instrument is not part of this endeavor. A review of the district's extra service pay schedule for coaches indicated parity. The data submitted on the T-35 form in the 2015-16 annual Title IX report shows that the amounts spent for coaching salaries for teams of "like" sports was comparable. Information in that report revealed that the coaching ratio for female athletes is 3.6 participants per coach and the ratio for male athletes is 4.6 participants per coach. Information gathered during the visit indicated that 100% of the head coaches of girls teams (4/4) and 100% of the head coaches of boys teams (4/4) were on-campus employees.
Locker Room, Practice and Competitive Facilities			The 2001 Title IX school visit report rated this benefit category <i>Deficient</i> stating that the baseball field had lights and softball did <u>not</u> . Also, the baseball field had a new concession stand with restrooms while softball had no concession stand and used porta-a-potties. The 2011 report rated this category <i>Satisfactory</i> documenting that lights had been installed at the softball field, safety fence had been added in front of the dugouts, and safety guard caps were on the outfield fence. The softball field had a portable concession stand and restrooms at the baseball field (within walking distance) were open for use during softball practice and games. The school is currently facing a significant challenge in regard to provision of benefits within this category. The gym, located on the school campus, was condemned by the state in 2016. As it exists, the facility can no longer be
Locker Room,			

<p>Practice and Competitive Facilities continued</p>			<p>used for practices or competitions, and this also includes use of the dressing rooms. The school is currently using the Hindman gym located approximately 18 miles from the school campus for all girls and boys basketball games and most practices. When the gym is not available for practice, the Knott County Sports-Plex is used. The school provides bus transportation to and from both these facilities. Locker rooms are used at both venues. Interviews indicated that the school administration along with coaches and athletes are making the best out of a difficult situation. Not having the gym has also eliminated dressing facilities and equipment storage areas for other school sponsored teams. In some cases, classrooms and offices are being used as dressing facilities. To the credit of the school, every student does appear to have a private place to dress and every team has at least some space for equipment storage. The tour of facilities revealed that the available space seemed to be assigned in an equitable manner. Regarding the remaining athletic venues—baseball, softball, track, and cross country—the amenities offered appeared to be comparable. It was emphasized to school officials that progress made in addressing the current situation should be documented on the Title IX Improvement Plan (T-60 form).</p>
<p>Medical and Training Facilities and Services</p>	<p>X</p>		<p>The two previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The 2011 report stated that the school had opened a new, very well equipped weight training room, and it appeared females were allowed equitable access. The school continues to maintain this weight training room currently. This facility offers numerous training options for female athletes. There was an equitable usage schedule for the weight room in the Title IX file. On the day of the most recent visit, this schedule was <u>not</u> posted at the facility. School officials and coaches confirmed that the schedule is usually posted at the facility. Interviews with student athletes gave strong indication that there was equitable access to the facility. The services of an athletic trainer are not provided for students at the school. Physical</p>



<p>Medical and Training Facilities and Services continued</p>			<p>examinations are offered free of charge by the school district on a designated day each school year.</p>
<p>Publicity</p>	<p>X</p>		<p>Both the 2002 and 2011 Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2011 report stated that the school had no guidelines addressing the provision of equity within this category. The school currently sponsors one cheerleading squad that is assigned to cheer at an equal number of home games for the boys and girls basketball teams. These assignments are monitored by the principal to insure parity. The school does not have a band or dance team at this time. The Title IX file contained regulations addressing the provision of athletic awards, post season banquets, and the posting of banners for athletic recognition. Interviews with coaches and student athletes offered evidence that both banquets and awards are provided. The T-35 form for 2015-16 showed <u>no</u> spending for awards for any school sponsored teams. <u>School administrators stated that the total Awards column on the T-35 form was incorrect.</u> (See <i>KHSAA Recommended Action</i>.)</p>
<p>Support Services</p>	<p>X</p>		<p>Both the earlier Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2011 report stated that total athletic spending had significantly favored male athletes for the past two years. The school has no active athletic booster clubs at this time. All spending for athletic benefits goes through school accounts, and the purchase order process is strictly followed. The internal analysis form for the 2014-15 annual Title IX report shows that 48% of the athletic expenditures were for females who made up 40% of the participants and 52% of the expenditures were for male athletes who made up 60% of the participants or approximately \$1,514 per female athlete and \$1,082 per male athlete. The internal analysis for the 2015-16 annual report shows that 51% of expenditures were for females who made up</p>

Support Services continued			44% of the participants and 49% of expenditures were for male athletes who made up 56% of the participants or approximately \$464 per female athlete and \$358 per male athlete for total support. When these expenditures are averaged over a two-year period, they appear to favor female athletes on both a percentage and per athlete basis for a non-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 T-60 forms call for the following:

- adding the sports of volleyball and the sport activity of archery at the middle school level;
- adding the sport of volleyball and the sport activity of archery as an intramural sport at the high school level.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the January 19, 2017 Title IX school visit.

The body of this report does document some “areas of concern” in regard to:

- The provision of an equitable written uniform review, rotation, and/or replacement plan (see *KHSAA Recommended Action*);
- The provision of equitable regulations addressing the mode of transportation for student athletes (see Travel and Per Diem Allowances);
- The submittal of complete and accurate expenditures for **Awards** on the T-35 form (see *KHSAA Recommended Action*);

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 benefits.

(Equipment and Supplies) On or before April 21, 2017, the school is to submit to KHSAA an equitable uniform review, rotation, and/or replacement plan which shows a full cycle of replacement for all school-sponsored teams. A copy of the plan is to become a part of the Title IX file.

(Publicity) On or before April 21, 2017, the school is to submit to KHSAA a written listing of all expenditures for awards for all school-sponsored teams as it should have appeared on the T-35 form in the 2015-16 annual Title IX report. (Note: This would be actual expenditures for the 2014-15 school year.)

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the January 26, 2011 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jonathan Mullins, 6050 Lotts Creek Road, Hazard, KY 41701  
(606) 785-4457

District Level Title IX Coordinator: Cavanaugh Trent, 1422 Hwy. 550 East, Hindman, KY 41822  
(606) 785-3153

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Ian Spurgeon	Student Athlete	(606) 785-4457
Victoria Ruanto	Student Athlete	(606) 785-4457
Tonya G.E. Cody	B & G Cross Country Coach	(606) 785-4457
Josh Hurt	Boys Basketball and Girls Softball Coach	(606) 276-5674
Cavanaugh Trent	District Athletic Director	(606) 785-3153
Jonathan Mullins	Principal	(606) 785-4457
Kevin Combs	Parent	(606) 785-4457

10. Comments

No one from the community attended the Public Comments session. The school district's athletic director and the school principal were commended for the thorough preparation for the school visit. The meeting was adjourned at 3:15 EST.