



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

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

School: Cumberland County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: December 6, 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
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 information on the internal audit summaries for the 2014-15 and 2015-16 annual Title IX reports, 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 annual report shows that females made up 53.82% of the school's enrollment, and they were 51.3% 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 T-2 form in the 2015-16 annual Title IX report shows that the school has added four teams—volleyball at all three levels and archery—for female participation during the past five years. These teams currently have 41 participants. The addition of these teams/participants has increased total female participation by 34.7%.

- 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 data provided on the most recent T-3 form and the student athletic interest survey indicate that the standard established by Test 3 is currently being met. The responses on the T-3 form appear to be supported by the information found in the most recent student athletic interest survey.

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

Comments: Information on the T-63 form in the 2015-16 annual Title IX report shows that an 82.3% 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		<p>The October 31, 2001 Title IX school visit report rated this category <i>Deficient</i> because it did not appear that the school was meeting the standard established by any of the three opportunities tests. The November 15, 2010 report rated this area <i>Satisfactory</i> and documented that the school seemed to be meeting the standards established by both Tests 1 and 3 for the provision of athletic opportunities. Annual reports submitted for the past two years give a clear indication that the school is currently meeting the standards established by <u>all three</u> opportunities tests. In relation to Test 1, the percentage of female participation is within 2.5% of the female enrollment. In regard to Test 2, the percentage of female participation has increased by 34.7% mainly because of the addition of a volleyball program at all three levels. The evidence related to Test 3 appears to show that the school has addressed the indicated athletic interests. School officials were reminded that in order to continue to meet the standard established by this test, the indicated interest in swimming should be addressed for validity and/or feasibility. (see a detailed explanation for all three 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 teams, an athletic handbook for coaches, a written booster club agreement, facilities usage schedules for the gym and weight training room, guidelines regarding awards and recognition of athletic accomplishments for both genders, documentation of locker room and athletic equipment storage space assignments for all teams, minutes for all Gender Equity Review Committee meetings held during the past three years, a written uniform review, rotation, and/or replacement plan, regulations addressing the equitable provision of travel and per diem (see</p>
Accommodation of Interests and Abilities			

continued			<i>Travel and Per Diem Allowances and KHSAA Recommended Action</i>), and a copy of the Athletic Facility Emergency Medical Plan (KRS 160.445). <u>School officials were commended for meeting the standards established by all three opportunities tests and for the development and maintenance of a comprehensive and well organized Title IX file.</u>
Equipment and Supplies	X		Both the 2001 and 2010 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The 2001 report requested that the school develop an equitable written plan for the review/replacement of uniforms. The 2010 report documented that the school had a written statement about replacing uniforms but <u>no equitable written plan was in place.</u> 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 tennis, boys and girls track, boys and girls cross country, and archery which are reviewed for replacement annually. Interviews with both student athletes and coaches gave strong indication that the written plan was being implemented. All the uniforms and equipment reviewed during the most recent visit were of high quality and appeared to be supplied in equitable quantities for both genders. Data submitted in annual Title IX reports for the past two years showed the school was spending approximately \$79 per female athlete and \$81 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		The two previous 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 showing equitable access for both genders were provided for the two shared venues—gym and weight training room. School officials were commended for the provision of parity in regard to scheduling athletic events during optimal playing times.
Travel and Per Diem Allowances	X		Both the 2001 and 2010 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . Written guidelines addressing

			<p>equitable provision in regard to the mode of transportation and the provision of meals for student athletes were found in the Title IX file. These regulations did not address lodging for athletes. (See KHSAA Recommended Action.) According to the information in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$130 per female athlete and \$139 per male athlete for travel and per diem.</p>
Coaching	X		<p>The earlier Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The school's athletic director is responsible for the evaluation of all head coaches. A written instrument is used as part of this process. A review of the district's extra service pay schedule for coaches indicated parity. The T-35 form in the 2015-16 annual Title IX report indicates that the total amounts spent for coaching salaries for teams of "like" sports is comparable. According to information in that report, the coaching ratio for male athletes is 14 participants per coach, and the ratio for female athletes is ten participants per coach. <u>This ratio seems to significantly favor female athletes.</u> Information gathered during the recent visit indicated that 71% (5/7) of the head coaches of girls teams and 83% (5/6) of the head coaches of boys teams were on-campus employees.</p>
Locker Room, Practice and Competitive Facilities	X		<p>Both previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The school currently has four well maintained locker rooms that are shared by all school-sponsored teams. These locker rooms appear to be assigned equitably. All teams are provided a safe and secure area for storage of their athletic equipment. One large area under the bleachers in the gym is partitioned off with enclosed sections assigned to each team. Only two coaches' offices are provided. One office is for the boys basketball coach, and the other is for the girls basketball coach. The practice and competitive venues are essentially the same as in 2010. The baseball, softball, and tennis facilities are located at Veterans Memorial Park about one mile from the school. The baseball and softball fields offer equitable amenities. It is</p>
Locker Room, Practice and			

Competitive Facilities continued			recommended that, if and when, either of these facilities is upgraded, <u>enlarging the softball dugouts should be a top priority.</u>
Medical and Training Facilities and Services	X		The 2001 and 2010 Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The 2010 report documented that a new weight training and cardiovascular room had been constructed which was equally accessible to all athletes. The most recent visit revealed that the school has two weight training areas. One area consists of free weights and the second area houses cardiovascular machines. Both areas have numerous training options that are suitable for female athletes. An equitable usage schedule for the training areas was in the Title IX file and posted at the facilities. Interviews with student athletes verified equitable access and widespread female usage of the facilities. The school does not provide regular access to an athletic trainer. Physical examinations are available free of charge for student athletes by a local physician along with the school nurse.
Publicity	X		The two earlier Title IX school visit reports rated 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 both the boys and the girls basketball teams. The band plays at all home boy/girl doubleheader basketball games. A local radio station broadcasts all (home and away) boys and girls basketball games. It also broadcasts an equal number of baseball and softball games each season. The Title IX file contained equitable written regulations addressing the posting of banners, the provision of athletic awards, and post season banquets. Data submitted on the T-35 form in the 2015-16 annual Title IX report shows that the school was spending approximately \$15 per male athlete and \$15 per female athlete for awards.
Support Services	X		The 2001 and 2010 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . At

			<p>the time of both visits, the school had one athletic booster club which supported all school-sponsored teams. The school continues to have one athletic booster club which houses all of its funds in school accounts. The purchase order process is required for expenditures of any booster club funds. This strict monitoring of booster spending is reflected in the parity of spending within each benefit category. The internal audit summary for the 2014-15 annual Title IX report shows that 56% of the expenditures were for females who made up 53% of the participants and 44% of the expenditures were for male athletes who made up 47% of the participants. This translates into spending approximately \$477 per female athlete and \$423 per male athlete. The 2015-16 internal audit summary shows that 55% of the athletic expenditures were for females who made up 51% of the participants and 45% of the expenditures were for male athletes who made up 49% of the participants. This means approximately \$452 was spent per female athlete and \$388 per male athlete. If the percentage and per athlete spending are averaged over a two-year period, it appears to slightly favor the female athletes at Cumberland County which is a non-football playing school.</p>
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:

attempting to change the uniform rotation plan from a four-year cycle to a two-year cycle for boys and girls basketball and softball and baseball.

IT SHOULD BE NOTED THAT THE SCHOOL REPORTED NO ITEMS ON THE 2014-15 TITLE IX IMPROVEMENT PLAN.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the December 6, 2016 Title IX school visit. It was noted during the Gender Equity Review Committee meeting that all indications pointed to the provision of both equitable opportunities and benefits being a high priority at the school.

The only area of concern listed in this report relates to the documentation of the process used to secure equitable lodging for students during overnight athletic trips. (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 area of concern be addressed in an attempt to continue to provide equitable benefits.

(Travel and Per Diem Allowances) On or before March 20, 2017, the school is to submit to KHSAA an expansion of the current regulations for travel and per diem which addresses equitable provision of lodging for student athletes. This expansion should also become a part of the Title IX file at the school.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the November 15, 2010 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Chuck Price, 912 N. Main St., Burkesville, KY 42717
(270) 864-3451

District Level Title IX Coordinator: Chuck Price, 912 N. Main St., Burkesville, KY 42717
(270) 864-3451

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Ande G. Flatt	Student Athlete	(270) 865-3451
Levi Owens	Student Athlete	(270) 459-4719
Kristen Anderson	GBB Coach	(270) 864-3451
Kendra McIntyre	Softball/Volleyball Coach	(270) 459-1931
Rodney Schwartz	Assistant Athletic Director	(270) 864-3377
Chuck Price	Athletic Director	(606) 305-7081
Angela Morrison	Principal	(270) 864-3851

10. Comments

No one from the community attended the Public Comments Session. Mr. Chuck Price, athletic director, was highly commended for his thorough preparation for the school visit. The meeting was adjourned at 3:15 CST.