



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

(For schools re-visited during the 2015-2016 school year)

School: East Carter
 Prepared By: Gary W. Lawson
 Date of Re-Visit: October 29, 2015
 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
- Improvement 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
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 rosters and data submitted, the school has met the standard established by Test 1 for provision of athletic opportunities for female athletes during each of the past three school years. That standard was met for both male and female athletes in the school year 2014-15. IT SHOULD BE NOTED THAT THE INTERNAL AUDIT SUMMARY FOR 2014-15 DESIGNATED MALES AS THE UNDERREPRESENTED GENDER IN ATHLETICS AT THIS SCHOOL.

- 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 indicate that the school has not met the standard established by Test 2 for provision of athletic opportunities during any of the past three school years. The T-2 form in the 2014-15 annual Title IX report shows that the school added three total teams for female participation and two teams for male participation during the past five years. The addition of these teams increased female participation by 11.4 % and male participation by 14%.

- 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 and responses submitted on the T-3 forms indicate that the standard established by Test 3 for provision of athletic opportunities 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. According to the latest T-2 form, the school offers 18 total teams for females and 15 total teams for males at this time.

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 2013-14 annual Title IX report documents that an 80.3% completion rate was received on the most recent student athletic interest survey. School officials were reminded that a minimum completion rate of 80% is required for the survey to be valid.

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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>The February 22, 2001 Title IX school visit report rated this area <i>Deficient</i> because the school did not provide evidence that the standard established in any of the three Title IX opportunities tests was being met. The November 5, 2009 school visit report designated this area <i>Satisfactory</i> stating it appeared likely that the standards established by both Test 1 and Test 2 were being met. Annual reports for the past three years give strong indication that the standards established by Test 1 and Test 3 are currently being met. The 2014-15 annual report shows that the standard of tolerance for Test 1 is within the acceptable range for both males and females. The internal audit summary for 2014-15 designates males as the underrepresented gender at the school (Row 12) and the Internal Analysis Summary for the 2013-14 annual report shows females as the underrepresented gender (Column 1, Row 2 and Row 9). The evaluation of Test 3 shows that the school appears currently to be accommodating the athletic interest of both genders. School officials were reminded that a minimum of 80% completion rate will be required on the 2015-16 athletic student interest survey. (See detailed explanation of each of the three opportunities tests on page 2 of this report). During the most recent visit, the school's Title IX file was reviewed and 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 schedules for coaches, a listing of the current members of the Gender Equity Review Committee, current game schedules for all school sponsored varsity teams, facility usage policies for the gym and the soccer field, written guidelines for the posting of banners, the provision of athletic awards and trophies, and the equitable provision of athletic banquets. The file also contained a written designation of the locker</p>

<p>Accommodation of Interests and Abilities continued</p>			<p>room and athletic equipment storage space assigned each team, game programs for football and girls and boys basketball, minutes from the Gender Equity Review Committee meetings held during the past three years, a plan for the review and replacement of uniforms, signed booster agreements, written regulations for travel and per diem (see <i>Travel and Per Diem Allowances</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160445). School officials were commended for the development and maintenance of a comprehensive and well organized Title IX file.</p>
<p>Equipment and Supplies</p>	<p>X</p>		<p>Both the 2001 and 2009 Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The 2001 report asked that an equitable uniform review/rotation plan be developed. The 2009 report documented that some guidelines for purchases had been written but no rotation plan had been developed. The most recent visit showed that the school has a written plan for review/replacement of uniforms based on a four-year cycle of rotation for all teams except boys and girls golf, boys and girls tennis, girls swimming, and archery. These teams replace uniforms annually. All uniforms and equipment reviewed during the visit appeared to be mid-to-high quality and was supplied in equitable quantities. According to information submitted in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$189 per female athlete and \$158 per male athlete for equipment and supplies.</p>
<p>Scheduling of Games and Practice Time</p>	<p>X</p>		<p>Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2009 report documented that the school had no usage schedule for the soccer facility which was shared by both the boys and girls teams. During the most recent visit, facility usage schedules showing parity were provided for the gym and soccer field. Information gathered during this visit indicated that the number of competitive events scheduled for teams of "like" sports was comparable. The school is nearing completion in construction of a building</p>

Scheduling of Games and Practice Time continued			which will house an indoor hitting facility for baseball and softball. <u>When this venue is ready, a usage schedule should be developed and posted at the facility.</u> The scheduling of athletic events during the most optimal playing times was discussed with school officials who were encouraged to continue to strive for parity regarding this benefit.
Travel and Per Diem Allowances	X		The 2001 and 2009 school visit reports deemed this benefit category <i>Satisfactory</i> . Written guidelines addressing equitable provision in regard to mode of transportation and meals and lodging for student athletes were found in the Title IX file at the time of the most recent visit. <u>UPON RECEIPT OF THIS REPORT, THESE GUIDELINES SHOULD BE EXPANDED TO INCLUDE THE EQUITABLE PROVISION OF CHARTER BUSES.</u> The data provided in the 2013-14 and 2014-15 annual Title IX reports show that the school was spending approximately \$65 per female athlete and \$43 per male athlete for travel and per diem.
Coaching	X		The 2001 Title IX school visit report rendered this benefit category <i>Deficient</i> stating that several of the girls teams had fewer assistant coaches than the “like” sports for boys. The 2009 report deemed this category <i>Satisfactory</i> documenting that the number of assistant coaches for all “like” sports was proportional to the number of participants listed as team members. The school’s principal is responsible for the evaluation of all head coaches. A written instrument is not currently used as a part of this process. A review of an <u>updated</u> school district extra service pay schedule indicated parity. The expenditures submitted on the most recent T-35 form indicate that the total amount spent for coaching salaries for teams of “like” sports shows relative parity. According to data submitted in the 2014-15 annual Title IX report, the coaching ratio for females was one coach per 11 participants and for male athletes it was one coach per 14 participants. These ratios appear to favor female athletes. Information gathered during the recent visit revealed that all nine head

Coaching continued		coaches of girls teams are employed off the school campus while 50% (4/8) of the head coaches of boys teams are employed on the school campus. It appears that male athletes have an advantage in relation to on-campus coaches.
Locker Room, Practice and Competitive Facilities	X	<p>The 2001 school visit report rated this category <i>Deficient</i> stating that the amenities at the softball field were inferior to those at the baseball field. The report also documented that the male athletic programs had an advantage in their provided locker space. The 2009 school visit report rated this category <i>Satisfactory</i>. The report stated that a new softball complex had been completed in May, 2004. This complex provided excellent amenities. The report also noted that all available locker room space was assigned equitably. The most recent visit revealed that the indoor and outdoor venues appear equitable. The tennis courts, softball field, and the soccer field are located at the middle school about one and a half miles from the high school. The girls swim at the YMCA in Ashland, Kentucky. The girls and boys play golf at the Grayson Lake State Park located about six miles from the school. Archery practices and competitions are held at the Kyoba Mall about three miles from the school. All other venues are on the school campus. Although it does not appear to be an equity issue at this time, there is a definite shortage of locker room and athletic equipment storage space at the school. Both the football team and the girls softball teams have exclusive use of a dressing area near their competitive facilities. All other school sponsored teams share three dressing rooms in the gym. Two of these dressing rooms are well appointed while the third area (a physical education dressing room) provides low quality amenities. These dressing rooms do seem to be assigned equitably. Most of the equipment storage areas are nearly filled to capacity but also appear to be assigned equitably. According to information gathered during interviews at the time of the most recent visit, a changing area for tennis and soccer is in the planning stages. Progress</p>

			made in relation to this project should be documented on the school's Title IX Improvement Plan (T-60 form).
Medical and Training Facilities and Services	X		Both the previous Title IX school visit reported designated this benefit category <i>Satisfactory</i> . The 2001 report requested that an equitable usage schedule be posted at the weight training facility. The 2009 report documented that the schedule was posted as requested. As was the case at the time of the 2009 visit, the school has a small weight training room adjacent to the gym which is open for use by all teams. An equitable usage schedule continues to be posted at the facility. There is also some weight training equipment housed inside the football locker room. This equipment is used almost exclusively by football players. Interviews at the time of the most recent visit indicate that boys soccer and boys track have shared this equipment occasionally. The gym weight room which is used by female athletes appears to be in need of more equipment that is suitable for females to use. It is recommended that the school take steps to provide some smaller hand weights and, perhaps, a universal machine. <u>Documentation of progress in this area should be part of the school's Title IX Improvement Plan (T-60 form)</u> . The school employs a full time certified athletic trainer who is available on an equitable basis to all student athletes. On a designated day each spring, free physical examinations given by local physicians are offered at the high school to any student athlete.
Publicity	X		The 2001 Title IX school visit report rated this benefit category <i>Deficient</i> but gave no explanation. The 2009 report rated this category <i>Satisfactory</i> . The school currently has one varsity cheerleading squad that cheers at all home football games. They also cheer at all home girls and boys basketball games and at away games versus West Carter. The full band performs at all home football games. The pep band performs at three home boys basketball games and at the same number of girls home basketball games. A local radio station broadcasts three home football games each

Publicity continued			year. They also cover an equal number of selected boys and girls basketball games. The school's Title IX file contained guidelines for the provision of equity in regard to the posting of athletic banners and the provision of athletic awards and postseason athletic banquets. According to data submitted in the 2013-14 and the 2014-15 annual Title IX reports, the school was spending approximately \$45 per female athlete and \$29 per male athlete for awards.
Support Services	X		The two previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2009 report did recommend that the school develop a plan for administrative oversight of booster club expenditures. The school currently has three athletic booster clubs that serve softball, volleyball, and football. Each of these clubs house their funds off the school campus. The school has signed written agreements with each of these clubs, and they are required to submit annual budgets to the school's site based committee. A suggestion was made during the most recent visit that school officials expand the agreements with the booster clubs to include the requirement for administrative approval of all booster purchases. The Internal Analysis Summary for the 2013-14 annual Title IX report shows that 48% of athletic expenditures were for female athletes who made up 44% of participants while 52% of athletic expenditures were for male athletes who made up 56% of participants. The Internal Audit Summary for the 2014-15 annual report shows that the school was spending approximately \$485 per female athlete and \$478 per male athlete for total support. These expenditures appear to be well within generally accepted parameters for the provision of parity.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		

Recruitment of Student Athletes	NA		
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5. Brief Summary/Analysis of the Improvement Plan (Form T-60)

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

- upgrading the gymnasium
- Adding restrooms at the soccer field.

It should be noted that the items for improvement listed in the annual report have remained the same for the past three years.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the October 29, 2015 school visit.

It was recommended that the school expand its written guidelines for travel and per diem to include stipulations for provision of chartered buses. (See *Travel and Per Diem Allowances*.)

School officials were also cautioned to make sure that at least an 80% completion rate is received on the 2015-16 Student Athletic Interest Survey. (See *Comments* section on page 2 of this report.)

The current report recommends that any activities or projects that enhance the provision of athletic benefits at the school be part of the Title IX Improvement Plan (T-60 form). (See *Summary/Analysis of Corrective Action Plan—T-60 form*.)

7. KHSAA Recommended Action in relation to new deficiencies

No deficiencies were designated in the October 29, 2015 Title IX school visit report.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated in the November 5, 2009 Title IX school visit report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Donald M. Damron, 228 S.Carol McClure Blvd., Grayson, KY
 (606) 474-6696 41143

District Level Title IX Coordinator: Brandon Baker, 405 Hitchins Rd., Grayson, KY 41143
 (606) 474-5714

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Michael Marsh	Student Athlete	(606) 474-5714
Haley Hall	Student Athlete	(606) 474-5714
Jeff Porter	Assistant Principal	(606) 474-8815
Hager Easterling	Girls Basketball Coach	(606) 474-5714
Donald M. Damron	Director of Personnel/ Title IX	(606) 474-2012
Brandon Baker	Athletic Director	(606) 474-5714
Ben Fritz	Assistant Principal	(606) 474-5714
Larry Kiser	Principal	(606) 474-5714
Jeremiah Shearer	Baseball Coach	(606) 474-5714

10. Comments

No one from the community attended the Public Comments session. The school's athletic director was commended for the excellent preparation for the school visit. The meeting was adjourned at 3:20 pm EDT.