



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

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

School: Elliot County  
 Prepared By: Gary W. Lawson  
 Date of Re-Visit: October 25, 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)

	A	Substantial Proportionality
X	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: The rosters and data submitted by the school indicate that the standard established by Test 1 for provision of athletic opportunities was met during the 2014-15 school year. The internal audit summary documents that both subtest 1 and subtest 2 of Test 1 were met. The audit summary for 2015-16 states that none of the three subtests under Test 1 were met during that year. Therefore, it does not appear that the school is currently compliant with this test.

- 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 for the past two school years gives strong indication that the standard established by Test 2 for the provision of athletic opportunities is being met. The 2015-16 annual Title IX report shows that the school has added five teams for girls' competition and two teams for boys' competition during the past five years. By adding these teams, the girls' percentage of participation has increased by 51%, and the boys' percentage of participation has increased by 47.9%.

- 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 in the 2015-16 annual Title IX report indicates that the standard established by Test 3 for provision of athletic opportunities was being met. Unfortunately, these responses on the T-3 are not supported by the information in the most recent student interest survey. The survey shows an indicated interest in tennis (11) and swimming (24). There is no evidence in the report that these indicated interests have been addressed in any way.

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 found in the 2015-16 annual Title IX report shows that an 81.4% 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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<p>Accommodation of Interests and Abilities</p>	<p>X</p>		<p>The December 4, 2002 Title IX school visit report rated this area <i>Deficient</i>. At that time, the school provided no evidence that they were meeting the standard established by any of the three opportunities tests. The September 23, 2010 report rated this area <i>Satisfactory</i> and documented that the school appeared to meet the standard established by Test 1 for the provision of athletic opportunities. A review of recent annual reports gives strong indication that the standard established by Test 2 is currently being met. The 2015-16 Title IX internal audit summary shows that the school has increased female participation by 51% and the male participation by 47.9% by adding teams during the past five years. School officials were encouraged to attempt to meet the standard of Test 3 by providing documentation that the indicated interests in tennis and swimming are being pursued for validity. During the most recent school visit, the Title IX file was thoroughly reviewed. It was found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five years, an extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, game schedules for all school-sponsored varsity teams, facility usage schedules for the gym and weight training room, written guidelines regarding the provision of athletic awards and post season banquets and the posting of banners for recognition of athletic team accomplishments (see <i>Publicity</i>), written designation of the locker room and athletic equipment storage space assigned each team, written minutes for all Gender Equity Review Committee meetings held during the past three years, a plan for the equitable review, rotation, and/or replacement of uniforms, written regulations regarding the provision of travel and per diem (see <i>Travel and Per Diem Allowances</i>), and a copy of the Athletic Facility Emergency Medical Plan. School administrators were highly commended for the development and maintenance of a comprehensive and well organized Title IX file.</p>
<p>Accommodation of Interests and Abilities</p>			

continued			
Equipment and Supplies	X		Both the 2002 and 2010 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The most recent visit revealed that the school has a written plan for the review or replacement of uniforms based on a three-year cycle except for archery and boys and girls golf which replace uniforms each year. Interviews with students and coaches indicated knowledge of and adherence to the uniform plan. All uniforms and equipment reviewed during the most recent visit were of mid-to-high quality and appeared to be supplied in equitable quantities. According to data submitted in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$125 per female athlete and \$51 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		The two earlier Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The 2010 report documented that the school did not provide an equitable usage schedule for the gym. During the most recent visit, equitable facility usage schedules were evident for the shared venues (gym and weight training room). Information gathered during the visit indicated that the number of competitive events scheduled for teams of “like” sports was comparable. The scheduling of athletic events during the most optimal playing time was discussed with school officials who were commended for the provision of parity regarding this benefit.
Travel and Per Diem Allowances	X		The 2002 Title IX school visit report rated this benefit category <i>Satisfactory</i> and requested that equitable written guidelines be developed for the provision of travel and per diem. The 2010 report again rated this category <i>Satisfactory</i> but <u>documented that the school still had not developed or implemented the requested regulations</u> . Written guidelines addressing equitable provision of the mode of transportation, meals, and lodging were found in the school’s Title IX file during this latest visit. School officials were asked to expand the
Travel and Per			

Diem Allowances continued			lodging guidelines to show <u>specific parameters in relation to quantity of motel rooms</u> . IT SHOULD BE NOTED THAT THE T-35 FORM IN THE 2015-16 ANNUAL TITLE IX REPORT CONTAINED AN ERROR IN THE TRAVEL COLUMN REGARDING EXPENDITURES FOR GIRLS AND BOYS TRACK. CORRECTED FIGURES WERE PROVIDED TO THE KHSAA REPRESENTATIVE DURING THIS VISIT. Data submitted in the 2014-15 and 2015-16 annual Title IX reports show that the school was spending approximately \$95 per female athlete and \$128 per male athlete for travel and per diem.
Coaching	X		Both the previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The school's principal and athletic director are responsible for the evaluation of all head coaches. A written instrument is not currently used as part of this process. A review of the district's extra service pay schedule for coaches shows parity. The information submitted on the T-35 form in the 2015-16 annual report shows that the amounts spent for coaching salaries for teams of "like" sports was comparable. According to the data in the 2015-16 annual Title IX report, the coaching ratio for female athletes is 7.5 participants per coach and the ratio for male athletes is 13 participants per coach. The current ratio significantly favors female athletes. Information gathered during the most recent visit revealed that 57% (4/7) of the head coaches of girls teams and 83% (5/6) of the head coaches of boys teams were on-campus employees.
Locker Room, Practice and Competitive Facilities	X		The 2002 and 2010 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2010 report noted the softball dugouts had been upgraded. The tour of facilities during the most recent visit revealed that the softball field located at Lakeside Elementary School has been upgraded even more. The outfield fence has been improved and an athletic equipment storage building at the facility has been added. It should be noted that the school currently <u>does not</u> sponsor a baseball team because of a lack of participants. All the other competitive venues

Locker Room, Practice and Competitive Facilities continued			appear to offer comparable amenities. The school has two large, well-maintained dressing rooms adjacent to the gym. These areas are almost identical. One dressing room is assigned to all male teams and the other one is assigned to all female teams. There is an obvious need for more locker room space, but the available space is assigned equitably. All school sponsored teams have an assigned athletic equipment storage space. It appears that additional equipment storage space is also needed, but, again, the available space has been assigned with equity as a priority. The school provides two coaching offices—one for the coaches of boys basketball and the other is for the coaches of girls basketball. These offices provide very similar amenities.
Medical and Training Facilities and Services	X		The 2002 Title IX school visit report deemed this benefit category <i>Satisfactory</i> , but documented that no equitable usage schedule was posted at the weight training room. The 2010 report also rated this category <i>Satisfactory</i> , but again stated that <u>“a usage schedule was not posted at the weight room.”</u> The most recent visit revealed that the school has a well-appointed weight training room located adjacent to the gym. An equitable usage schedule for this facility was found in the Title IX file and also <u>posted at the venue</u> . Interviews with student athletes verified equitable female access and use of the weight room. The facility contained several equipment options that are suitable for use by female athletes. An athletic trainer provided by Huntington Orthopedics is available to student athletes at all home boys and girls basketball games and at all home boys and girls soccer matches. Free physical examinations are available for all student athletes on a selected day during the month of August by St. Clair Medical Center.
Publicity	X		The two previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2002 report documented the need for written regulations regarding athletic recognition. The 2010 report stated that regulations were found in the file, but none of them addressed the



Publicity continued			<p><u>posting of athletic banners</u>. The school currently has one varsity cheerleading squad that cheers at all home and post season games for both the boys and girls basketball teams. The pep band performs at the homecoming and senior night, as well as all post season games, for boys and girls basketball teams. A local radio station broadcasts half of the boys and girls basketball games during the regular season. The Title IX file contained written guidelines for the posting of athletic recognition banners for all teams. IT IS REQUESTED THAT UPON RECEIPT OF THIS REPORT, THE BANNER GUIDELINES BE EXPANDED TO INCLUDE RECOGNITION OF ATHLETIC ACCOMPLISHMENTS BY <u>INDIVIDUALS</u>. The file also contained equitable regulations for the provision of awards and post season banquets. The interviews with student athletes failed to confirm that the current post season banquet regulations are being followed. THEREFORE, IT IS REQUESTED THAT UPON RECEIPT OF THIS REPORT, ALL REGULATIONS REGARDING AWARDS AND POST SEASON BANQUETS BE REVIEWED BY THE GENDER EQUITY COMMITTEE AND THEN BE SHARED WITH THE <u>HEAD COACHES OF ALL SCHOOL SPONSORED TEAMS</u>. Information in the 2014-15 and 2015-16 annual Title IX reports show that the school was spending approximately \$5.50 per male athlete and \$12 per female athlete for awards.</p>
Support Services	X		<p>The 2002 Title IX school visit report designated this benefit category <i>Satisfactory</i>. The 2010 report rated this category <i>Deficient</i> stating that <u>school reports indicated that no booster clubs existed</u>. Interviews during the visit revealed that at least three booster clubs, all with off-campus bank accounts, were supporting school sponsored teams. There was no indication that there was any type of administrative oversight of the spending by these clubs. The most recent visit showed that the school currently has booster clubs for girls basketball, boys and girls cross country, boys and girls track, and softball. The school now has written regulations in place</p>

Support Services continued			for the oversight of booster spending. These regulations state that all booster purchases must be approved by the principal or athletic director. The regulations are supported by written and signed agreements with each booster club. The spending pattern over the past two years appears to be consistent with the implementation of the regulations for oversight. The internal audit summary for 2014-15 showed that athletic spending was approximately \$309 per female athlete and \$263 per male athlete. The audit summary for 2015-16 showed that spending was \$236 per female athlete and \$292 per male athlete. If this spending is averaged over the two-year period, it seems to be well within generally accepted parameters for the provision of parity 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:

- pursuing any indicated interest in a bass fishing team, bowling team, and football team;
- re-instatement of the school's baseball team.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the October 25, 2016 Title IX school visit.

There were a few “areas of concern” listed in relation to the following:

- Insuring that **equivalence** is provided in relation to equitable lodging for student athletes. (See *Travel and Per Diem Allowances*.)
- Insuring parity in regard to the posting of banners for recognition of individual athletes. (See *Publicity*.)
- Insuring that all responsible parties are adhering to the current regulations for provision of equivalence regarding awards and post season banquets. (see *Publicity*.)

7. KHSAA Recommended Action in relation to new deficiencies

No new deficiencies were designated in the body of this report. There were minor “areas of concern” that should be addressed in an attempt to insure that a continuation of equitable benefits is provided. These concerns are listed under the benefit categories of *Travel and Per Diem Allowances and Publicity*.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The one deficiency, in the benefit category of *Support Services*, designated by the September 23, 2010 Title IX school visit report seems to have been addressed by the development and implementation of a system for administrator oversight of athletic booster spending in relation to the provision of equitable benefits. The confirmation of the implementation of this system is the consistent pattern of equitable athletic spending over the past two school years.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Greg Adkins, P.O. Box 687, Sandy Hook, KY 41171  
(606) 776-1999

District Level Title IX Coordinator: Greg Adkins, P.O. Box 687, Sandy Hook, KY 41171  
(606) 776-1999

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Stephanie Sturgill	Cheerleader Coach	(606) 738-8052
Angie Lewis	Volleyball Coach	(606) 738-8052
Sydney Sturgill	Student Athlete	(606) 738-8052
Sydney DeHart	Student Athlete	(606) 738-8052
Chase Porter	Student Athlete	(606) 738-8052
Greg Adkins	Athletic Director	(606) 738-8060
Steve Gillum	Golf Coach	(606) 738-8052
C. Thomas Potter II	Superintendent	(606) 738-8002

10. Comments

No one from the community attended the Public Comments session. The school's athletic director was commended for his thorough preparation for the school visit. The meeting was adjourned at 3:17 pm EDT.