



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

(For schools re-visited during the 2013-2014 school year)

School: Fulton County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: September 24, 2013
 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
- Title IX 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
	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 in the annual Title IX reports indicate that the school has met the standard established in Test 1 for provision of athletic opportunities during each of the past two school years (2011-12 and 2012-13).

- 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: According to the rosters and information submitted by the school, the standard established in Test 2 for provision of athletic opportunities has not been met during any of the past three school years. The 2012-13 annual Title IX report shows that no teams at any level for either gender have been added during the past five years.

- 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 in the annual Title IX reports reveal that the school is not currently meeting the standard established in Test 3 for provision of athletic opportunities. There is no evidence in the reports that the indicated interest in girls tennis (37), girls soccer (36), and bowling (17 girls) has been pursued for validity.

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

Comments: According to documentation in the 2011-12 annual Title IX report, a 100% 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>The October 24, 2001 school visit report rendered this area <i>Deficient</i>. The documentation showed that the school was not meeting the standard established in any of the three tests for provision of athletic opportunities. The Title IX re-visit report from October 26, 2005 stated this category was <i>Satisfactory</i>. The school appeared to be meeting the standard established in Test 2 at that time. The most recent Title IX annual reports show that the standard of Test 1 is currently being met. School officials were encouraged to pay particular attention to the accuracy of team rosters submitted to KHSAA. It is also important to pursue the validity of the indicated interest show on the student athletic interest survey. The Title IX file was reviewed during the visit. It was found to contain the two previous Title IX visit reports, all the annual Title IX reports for the past five years, a board-approved extra service pay schedule for coaches, a current listing of the members of the Gender Equity Review Committee, game schedules for all school sponsored sports, a school-generated athletic handbook, by-laws for the booster club as well as a "Request for Booster Club Funds" form, usage schedules for both shared athletic facilities (gym and weight room), some guidelines regarding awards and athletic recognition (see <i>Publicity</i>), written designation of the locker room and athletic storage space assigned each team, minutes for Gender Equity Review Committee meetings held during the past two years, some vague guidelines relating to travel and per diem (see <i>Travel and Per Diem</i> and <i>KHSAA Recommended Action</i>) and an athletic facility emergency plan (KRS 160.445). School officials were encouraged to continue to develop a comprehensive Title IX file.</p>
Equipment and Supplies		X	<p>The 2001 school visit report deemed this benefit category <i>Deficient</i>. The school did not make a full sampling of uniforms available for review and did not complete the required</p>

Equipment and Supplies continued			assessment forms. The 2005 report noted improvement in this area and so it was rated <i>Satisfactory</i> . The uniforms reviewed during the most recent visit were of mid-to-high quality. There appeared to be some disparity in quality of uniforms for girls basketball compared to those for boys basketball. There was also a difference in the quantity of uniforms provided for softball and baseball. Baseball had two jerseys while softball had one. Although the school had been required to submit a uniform review, rotation, and/or replacement plan to KHSAA on <u>March 2, 2006</u> , there was no evidence found during this visit that any plan was in place at this time. According to the 2011-12 and 2012-13 annual reports, the school was spending approximately \$103 per male athlete and \$65 per female athlete for equipment and supplies. The disparity found in the provision of uniforms combined with the lack of evidence of the implementation of a uniform review plan lead to a <i>Deficient</i> rating in this area. (See <i>KHSAA Recommended Action in relation to new deficiencies</i> .)
Scheduling of Games and Practice Time	X		The 2001 school visit rated this benefit category <i>Deficient</i> stating there was a lack of provision of optimal playing times for female athletic teams. The 2005 report rated this area <i>Satisfactory</i> noting that significant progress had been made in providing optimal playing times for female teams. According to information gathered during the school visit, the number of competitive events scheduled for teams of “like” sports was comparable. All shared practice facilities seemed to be assigned equitably. The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the recent provision of parity regarding this benefit.
Travel and Per Diem Allowances		X	This benefit category was rendered <i>Satisfactory</i> by both the previous Title IX school visit reports. The October, 2005 report did request the development of equitable written guidelines in this area. The recent visit showed the school had some written

Travel and Per Diem Allowances continued			<p>guidelines for travel, but some were not student-directed and did not address the required categories for the provision of parity. Neither total nor per athlete spending in this area could be calculated because the amounts submitted on the T-35 form were inaccurate. The failure to provide equitable written guidelines and accurate spending information renders this area <i>Deficient</i>. (See <i>KHSAA Recommended Action in relation to new deficiencies</i>>)</p>
Coaching	X		<p>Both previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The most recent visit showed that the total amounts spent for coaches' salaries for teams of "like" sports was equivalent. The school's athletic director is responsible for evaluating all head coaches each year using a written instrument. Information gained during the visit showed that all the school's head coaches for both genders are on campus employees.</p>
Locker Rooms, Practice and Competitive Facilities	X		<p>Both the previous Title IX school visit reports rated this benefit category <i>Deficient</i>. The reason given in both cases was the disproportionate assignment of locker space at the school. The male athletes had a distinct advantage at the time of both visits. This disparity appears to have been addressed by the construction of a small but very well appointed girls basketball (only) dressing room in the gymnasium. Girls softball now shares an adequate dressing room with the volleyball team. The review of competitive facilities showed parity of provision. The baseball and softball fields offer essentially the same amenities. Although equipment storage space is in short supply, it does appear to be assigned equitably. There are no coaching offices provided at the school at this time.</p>

Medical and Training Facilities and Services	X		The 2001 and 2005 Title IX school visits deemed this benefit category <i>Satisfactory</i> . At the time of the previous visits, the school maintained two weight training rooms—one for boys teams and one for girls teams. The most recent visit showed that the school has one weight training room. A usage schedule that showed parity was in the Title IX file as well as posted at the facility. Interviews with coaches and student athletes confirmed that equitable access was provided. The facility had equipment that was appropriate for female use. Athletic trainer services are not provided at this time for either gender. Free physical examinations are provided on a designated day during the summer for all athletes.
Publicity			The two previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The school currently has one cheerleading squad that cheers at all home games and at away games versus district opponents for the football and boys and girls basketball teams. The school has some written guidelines addressing the provision of parity in this area. <u>Upon receipt of this report</u> , These guidelines should be expanded to include the posting of banners in the gym recognizing team and individual athletic participation at the state level. These guidelines should also include the specific per athlete formula used to distribute the funds for purchase of athletic awards. According to information in the 2011-12 and 2012-13 annual Title IX reports, the school was spending approximately \$3.00 per female athlete and \$5 per male athlete for awards.
Support Services	X		The October 24, 2001 school visit report rated this category <i>Satisfactory</i> . The October 26, 2005 report rendered this category <i>Deficient</i> saying that the Title IX file was incomplete regarding this benefit and the Gender Equity Review Committee was non-functioning. The

continued			most recent visit showed that the school has one booster club that serves all teams. Documentation indicates that a mechanism for administrative oversight of expenditures is in place. A "Booster Funds Request" form must be approved by both the principal and athletic director before any expenditure can take place. An analysis of spending over the past two years showed that in 2011-12 expenditures strongly favored the male athletes--\$551 per male athlete and \$367 per female athlete. The 2011-12 Title IX improvement form listed corrective action to be taken. The 2012-2013 annual report showed significant progress--\$324 per female athlete and \$436 per male athlete. These figures slightly favor male athletes in a football playing school. This difference could be caused by the inaccurate figures submitted in the <i>Travel and Per Diem</i> category. (See <i>Travel and Per Diem</i> .) School officials were cautioned to monitor expenditures very closely so that this disparity does not continue over a three-year period.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		

5. Brief Summary/Analysis of the Title IX Improvement Plan (Form T-60)

The school's most recent Title IX Improvement Plans call for the following:

- developing strategies to increase participation opportunities;
- improvement of baseball and softball facilities;
- upgrading female dressing room facilities;
- development of intramural athletic programs;
- expansion of middle school and youth programs.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The September 24, 2013 school visit revealed Fulton County High School to be deficient in two areas. In the benefit category Equipment and Supplies, there were disparities in the uniforms provided to girls basketball and softball and no uniform review, rotation, and/or replacement plan was in place. (See KHSAA Recommended Action.) In the benefit category Travel and Per Diem, the expenditures submitted on the T-35 form were inaccurate and the written guidelines provided in this area were not adequate. (See *KHSAA Recommended Action*.)

7. KHSAA Recommended Action in relation to new deficiencies

Equipment and Supplies

- On or before December 3, 2013, the school is to submit to KHSAA a written plan for equitable provision in relation to the girls softball uniforms. At the time of the recent visit, the school provided two baseball jerseys and one softball jersey. Pictures may be used as evidence in this endeavor.
- On or before December 3, 2013, the school is to submit to KHSAA a written uniform review, rotation, and/or replacement plan that contains equitable review intervals for all “like” sports. This plan is to be shared with the Gender Equity Review Committee, all head coaches, and be placed in the school’s Title IX file.

Travel and Per Diem Allowances

- On or before December 3, 2013, the school is to submit to KHSAA a corrected “Travel” column on the T-35 form showing accurate expenditures for the 2011-12 school year.
- On or before December 3, 2013, the school is to submit to KHSAA written guidelines for equitable provision in this category. These guidelines should address mode of transportation and provision of food (meals) and motel rooms.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency in the area of **Locker Rooms, Practice and Competitive Facilities** designated in the October 26, 2005 school visit report appears to have been addressed by the construction of a new girls basketball dressing room and the reassignment of other dressing rooms with the provision of parity as a priority.

The deficiency in the category of **Support Services** designated in the October 26, 2005 school visit report appears to have been addressed by corrective actions taken in 2011-12 and the addition of further administrative oversight of booster expenditures. (See *Support Services* in the body of this report.)

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Rick Garland, 2780 Moscow Avenue, Hickman, KY 42050
(270) 236-3923

District Level Title IX Coordinator: Rick Garland, 2780 Moscow Avenue, Hickman, KY 42050
(270) 236-3923

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Aaron Kins	Student athlete	(270) 236-3923
Amy Langford	Student athlete	(270) 236-3923
Mathew Dillon	Coach	(270) 236-3923
Leonard Smith	Coach	(270) 236-3923
Tracy Lam	Principal	(270) 236-3923
Denise Grissom	Parent/GREC	(270) 236-3923 x 2131
Rick Garland	Athletic Director	(270) 236-3923 x 6010

10. Comments

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