

## KHSAA TITLE IX RE-VISIT FINAL AUDIT REPORT

(For schools re-visited during the **2007-2008** school year)

School: Grayson County High School

Prepared By: Gary W. Lawson

Date of Re-Visit: September 26, 2007

Telephone Number of Preparer: (502) 875-3817

Reviewed By: Larry Boucher

1.	Completed	Required	<b>Forms</b>
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Opportunities Component of Title IX Compliance			
Corrective Action Plan Summary Charts (Form T-74)	Yes <b>⊠</b> No □		
Benefits Publicity (Form T-73)	Yes ⊠No □		
Benefits Summary Charts (Forms T-71 & T-72)	Yes <b>⊠</b> No □		
Participation Opportunities Summary Chart (Form T-70)	Yes ⊠No □		
Verification of Forms (Form GE-50)	Yes ⊠No □		

# 2.

Area of Compliance: (Check One or More)

	A	Substantial Proportionality
* · · · · · · · · · · · · · · · · · · ·	В	History and Continuing Practice Of Programs Expansion
X	С	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 data submitted by the school, it has met the standard established in Test #1 for the provision of athletic opportunities during two of the past three school years (2004-05 and 2005-06).
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: Primarily due to the addition of girls soccer and volleyball, the school met the standard established in Test #2 for the provision of athletic opportunities during the 2004-05 school year.
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: According to the responses on the T-3 form as supported by the most recent student survey, the school appears to be currently meeting the standard established in Test #3 for provision of athletic opportunities.
3. Is the school's most recent Student Interest Survey accurate in relation to the assessment of Interests & Abilities? Yes ☒No □
Comments: Interviews with school officials and a review of the surveys themselves indicates that the student body was properly survey. The data reveals that an 85% return rate was received on the most recent student survey.
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4. Checklist of the Title IX Components of the Interscholastic Program

Benefit to	Satisfactory	Deficient	Comments
Students			
Benefit to Students  Accommodation of Interests and Abilities	X	Deficient	The October 30, 2002 visit report stated that at that time the school was not meeting the standard established in any of the three tests for provision of athletic opportunities. The school was rendered deficient in this area. Primarily due to the addition of both volleyball and girls soccer, the school has met the standard established in at least one of the three tests during all of the past three school years. The school is currently offering all of the sanctioned sports for girls at the varsity level except swimming which does not appear to be a feasible option at this time. School officials are to be commended for addressing this area of need in a positive manner. KHSAA officials reviewed the school's Title IX file. It contained the school's most recent self study, all the annual reports to KHSAA, a board approved coaches salary schedule, sample team game schedules for most sports, some regulations for booster clubs (see Support Services), several facility usage schedules, a written designation of assigned locker room space, a written designation of assigned athletic storage space, some written GERC minutes (see KHSAA Recommended Action), a written uniform review and replacement plan, and a written policy relating to "overnight" travel (see Travel and Per Diem). The school had no copy of the October 30, 2002 visit report or the responses by the KHSAA office to their annual reports. Copies of these important documents were
			given to school administrators by KHSAA officials. It appears that the school has had student participation on the Gender Equity

Equipment and Supplies	X	The October 30, 2002 report indicated that the school had a uniform review and/or replacement plan in place. The school's Title IX file currently contains a plan for replacement. The number of years on the plan varies, but it appears equitable for "like" teams. The uniforms viewed by KHSAA officials appeared equitable. The school's 2006-07 annual report indicates that it spent approximately \$137 per female athlete compared to \$210 per male athlete for equipment and supplies. School officials were alerted to the fact that this is a significant difference that should be closely monitored. (See Support Services and KHSAA Recommended Action.)
Scheduling of Games and Practice Time	X	The October 30, 2002 report indicated that the school was scheduling slightly less than the recommended number of prime date games for girls basketball. A review of the school's 2006-07 girls basketball schedule showed that 40% (4/10) of their home games were scheduled on prime dates, and they were also meeting the standard for "prime time" play. The school's re-visit report showed parity in the number of contests scheduled for all sports.
Travel and Per Diem Allowances	X	The school's 2006-07 annual report showed that the school was spending approximately \$142 per female athlete compared to \$96 per male athlete for provision of travel and per diem. The school's Title IX file contained a written policy relating to provision of per diem during "overnight trips." It was strongly suggested to school administrators that this policy be expanded to include all trips.

Canalisan	X	The school district's extra service pay schedule
Coaching	<b>A</b>	
		appears to show parity. The school's reports to
		KHSAA have consistently shown that the boys
		basketball program has four coaches while the
		girls have only two. School administrators
		contend that they have advertised properly and
		have been unable to find "acceptable coaches"
		for these two positions. They report that the
		two girls coaches are paid the same total salary
		as the four boys coaches. KHSAA officials
		explained the need for an equivalence of
		benefits in relation to coaches' accessibility.
		For that reason, school administrators should
		continue an "all out" effort to fill the two
		positions. The school's re-visit form shows that
		75% of the current girls coaches are on-campus
		employees compared to 63% of the boys
		coaches.
Locker Rooms.	X	As was the case at the time of the October 30.
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Practice and	X	2002 visit, storage space for athletic equipment
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Medical and Training Facilities and Services	X		The October 30, 2002 report suggested that a weight room usage schedule be posted at the facility. The recent visit showed that a schedule was in the Title IX file and also posted at the facility. The October 30, 2002 report requested that the school invest in more weight equipment that was suitable for use by female athletes. Several of the school's corrective action plans since that time have addressed this issue. The most recent visit showed that the school has added several smaller hand weights, bar bells, and a new set up machine. An athletic trainer from <i>Physical Therapy Solutions</i> is provided for the sports of boys and girls basketball, football, baseball, softball, and volleyball.
Publicity	X		The school's re-visit form as well as interviews with coaches and administrators indicates that the school currently has one cheerleading squad which cheers at all football games, all home boys and girls basketball games, and all boygirl doubleheader games that are played away. The school's T-35 and T-36 forms for the past two years show that booster club spending in this area consistently favors the boys teams. (See Support Services and KHSAA Recommended Action.)
Support Services		X	According to the school's last three annual reports to KHSAA, spending for total athletic support has favored the boys programs. As was discussed with school officials during the most recent visit, although the gap in per athlete spending has been narrowed since the school year 2004-05 it is still outside acceptable parameters. This spending gap appears to affect the benefits provided in several areas including, but not limited to, equipment and supplies, locker rooms, practice and competitive facilities, and publicity. Interviews with school officials and review of policy related documents in the Title IX file showed very little school administrative involvement in the

Support Services Cont'd		oversight of athletic booster club spending. It was emphasized to school officials that the school is responsible for inequities in benefits provided incurred as a result of booster purchases. The T-65 forms sent to the school by KHSAA since the school year of 2004-05 have noted concern in this area and have requested administrative monitoring. (See KHSAA Recommended Action.)
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 corrective action plans called for the following:

- Offering a girls soccer team at the junior varsity level
- Upgrading the school's weight training facility
- Adding girls coaches at various levels in the following programs—basketball, softball, soccer, and volleyball

### 6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The major deficiency observed during the most recent visit appears to be the lack of administrative oversight of athletic booster spending in relation to a number of benefit areas.

Although not a deficiency at this time, it is felt there is an "area of concern" that needs to be addressed by the school.

The lack of written minutes for Gender Equity Review Committee meetings is a concern. It appears there are minutes for recent meetings, but minutes for past meetings are sporadic at best.

### 7. KHSAA Recommended Action in relation to new deficiencies

(SUPPORT SERVICES) On or before <u>February 15, 2008</u>, the school is to submit to KHSAA written guidelines for oversight of athletic booster club spending in order to provide equity of benefits at the school. These guidelines should include the person(s)/position involved in the monitoring of spending as well as a definition of their roles. It should also include a step by step description of the purchase process to be used at the school. These guidelines should be signed by the principal, athletic director, and school/district Title IX coordinator.

The following information is to be submitted to KHSAA in response to the "areas of concern" mentioned earlier in this document.

(Accommodation of Interests and Abilities) On or before <u>April 30, 2008</u>, the school is to submit to KHSAA written minutes for at least <u>three</u> Gender Equity Committee meetings held during the 2007-08 school year. These minutes are to include all members' names who are in attendance.

### 8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency designated by the October 30, 2002 school report appears to have been successfully addressed, therefore, there are currently no reoccurring deficiencies at Grayson County High School.

### 9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator :Mike Houchin, 340 Schoolhouse Rd., Leitchfield, KY (270)259-4078 42754

District Level Title IX Coordinator: Mic Huffman, 909 Brandenburg Rd., Leitchfield, KY (270) 259-4011 42754

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 875-3817
Martha Mullins	KHSAA	(859) 599-5472
Sherry Vincent	Boys & Girls Tennis Coach	(270) 259-4175
Nancy Mudd	Softball/Volleyball Coach	(270) 258-4078
Mike Houchin	Athletic Director	(270) 258-4078
Doug Robinson	Principal	(270) 258-4078
Lisa Skaggs	Parent/Teacher	(270) 258-4078
Todd Johnson	Boys Basketball Coach	(270) 258-4078
Carolyn Thomason	School Board Chairperson	(270) 259-4011

### 10. Comments

No one from the community attended the Public Comments session. The meeting adjourned at 5:25 p.m. CST.

GRAYSON COUNTY SCHOOLS



909 Brandenburg Road • P.O. Box 4009 Leitchfield, KY 42755-4009 (270) 259-4011 • Fax (270) 259-4756



Carolyn Thomason Board Chairperson

Valeria Hayes
Vice Chairperson

Mona Fulkerson William Allen Anna Majors Board Members

Barry Anderson

Superintendent

Charlie Crain

Director of District Wide Services

Sharon Shartzer

Assistant Superintendent for

Instructional Assessment

January 15, 2008

Dear Ms. DeVries,

On September 26, 2007, representatives from KHSAA conducted a Title IX Re-visit at Grayson County High School. In the Final Audit Report a request was made that "written guidelines for oversight of booster club spending" be forwarded to your office prior to February 15.2008.

Enclosed you will find a copy of the guidelines now in place for the Grayson County School system. These guidelines were presented and discussed with all booster club organizations at a meeting on December 6, 2007.

It is our hope you will find these guidelines provide acceptable clarity in addressing your recommended action.

We are committed to total compliance concerning equity among our student athletes and are appreciative of your effort in providing assistance to our school system.

Please contact me with any questions you may have regarding the enclosed information.

Thank you,

Mic Huffman

Director of Federal Programs

**Grayson County Schools** 

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# BOOSTER ORGANIZATION FINANCIAL / TITLE IX MEETING

December 6, 2007 Grayson County High School

- I. Doug Robinson Welcome and Statement of Purpose.
- II. Kerry White Discussion of Financial, Budgeting, and Purchase procedures.
- III. Mike Houchin Grayson County High School Athletic Director

### **GRAYSON COUNTY SCHOOLS**

(Taken from: Accounting Procedures for Kentucky School Activity Funds") 702KAR 3:130(3) and KRS 156,070

## SUPPORT/BOOSTER ORGANIZATIONS USING EXTERNAL ACCOUNTS

### **AUTHORITY:**

1. Raise funds through board approved activities on and off school property in the name of the school or school activity and maintain those funds in a separate bank account.

### RESPONSIBILITIES:

- 1. A support/booster organization using external accounts shall not use the state tax exempt or federal identification number of the school or district but may obtain a state tax exempt number specifically and only for the use of the support/booster organization. A federal identification number, specifically and only for the use of the support/booster organization, shall also be obtained if required for federal reporting purposes.
- 2. Submit the names of the club officers to the principal at the beginning of the school year.
- Submit an annual booster club budget to the principal within the first thirty days of the school year showing estimated revenues from admissions, fundraisers, dues, concession sales, and other categories, and estimated expenditures by category.
- 4. Ensure funds are expended in accordance with the purpose and intended use only.
- 5. Submit an annual financial report to the principal by July 25 for the year ended June 30 reporting receipts from admissions, fundraisers, dues, concession sales, and other categories; expenditures by payee; and beginning and ending balances.
- 6. Ensure compliance with Title IX issues as it relates to fundraising and expenditures.
- 7. Booster checking accounts are required to have two signatures, the head coach/sponsor and either the Booster President or Treasurer.
- 8. Submit quarterly financial reports to the principal (October 10, January 10, April 10) reporting receipts by category, expenditure by payee, and beginning and ending balances.

GCH\$ Principal

CMS Principal

Athletic Director

litle IX Coordinator

# GRAYSON COUNTY EXTRACURRICULAR BUDGETS AND PROCEDURES School Year 2007-2008

During our Title IX audit, some compliance issues surfaced in regard to purchase orders, invoices, expenses, and purchases made in extra-curricular projects.

### **PURCHASE ORDERS:**

Purchase orders are to be filled out and approved <u>BEFORE</u> orders are placed. Auditors check invoice dates against Purchase Order entries—not the date you put on the PO but the date it is entered in MUNIS at Central Office. Purchase Orders have a maximum two-day turn around (usually same day). If the PO was needed yesterday, either give it to the Athletic Director to walk through or call CO. You have to do a PO prior to ordering supplies, equipment, or uniforms.

### **INVOICES:**

Invoices/packing slips are generally received with merchandise. The coach needs to check the invoice/packing slip against the PO for accuracy of the order. Sign and date the invoice/packing. Attach the invoice/packing slip to the goldenrod copy of the PO and sign in the box in the lower left hand corner indicating it is "OK to pay". Give this to the school secretary to send to CO or deliver to Tina Kiper at CO. We will not pay a bill until we receive a packing slip/invoice signed by the coach indicating his/her approval to pay.

### **PURCHASES:**

The Board approves a Bid List for athletic supplies, equipment, and uniforms. If a vendor is on the bid list, then comparisons are not needed. If you are not using a vendor from the Bid List, you MUST do a comparison pricing with one of the approved vendors. Comparison pricing should be placed in the NOTES box on the Purchase Order. NOTE: The auditors pulled some equipment/uniform purchases and questioned if proper bidding process was followed.

### **OTHER EXPENSES:**

If your squad/team has an overnight stay, do a purchase order and request direct billing. If they will not direct bill the Board, request a manual check to be cut for you to take. You know ahead of time so do not wait until the last minute to request the manual. You will then turn the receipt into CO following your overnight stay. Some hotels will direct bill the Board but a PO must be filled out in advance. We do allow boosters to reimburse us for the team and coaches' rooms, thus, no state tax on those rooms.

# A reminder that all overnight stays and out of state trips must have SBDM and Board approval.

Coaches are expected to be frugal in arrangements. The Board expects four students (same sex) per hotel room. The Board has also adopted a policy of paying a maximum of \$20 a day for student meals when an overnight stay is involved for State Competition. Coaches can request a manual check for meals at \$20 per student and should then turn in receipts and any unspent money at the end of the stay.

## MIDDLE SCHOOL BOOSTER CLUB AGREEMENT

This agreement is entered into by ar	nd between the Grayson County Board of
Education (hereafter referred to as "board")	and an entity known as Grayson County
Middle School	(hereafter referred to as the
"Booster Club"). Through this Agreement,	the parties intend to set forth the Terms and
Conditions under which the Booster Club n	nay operate and associate with students,
teachers, coaches/sponsors and school admi	inistrators at Grayson County Middle School

### TERMS AND CONDITIONS

- 1. The Booster Club acknowledges that the Board is responsible for the promotion of education and the general health and welfare of all students attending the Grayson County Public Schools. In addition, the Booster Club acknowledges that the Board has control and management of funds and all public school property in its district and may use its funds and property to promote public education (KRS 160.290).
- 2. The Booster Club acknowledges that its activities may affect compliance with Title IX of the Educational Amendments of 1972 (Title 20, U.S.C. 1681-1687, et seq.) by Grayson County Middle School and the Board. 702 KAR 7:065, Section 2 (13). The Booster Club further agrees to refrain from engaging in any activity which, in the opinion of the administration of Grayson County Middle School or the Superintendent of the Grayson County Public Schools, adversely affects the school's or the Board's ability to comply with Title IX.
- 3. The Booster Club shall, on or before August 15, each year, designate a representative for purposes of communicating with and providing true and accurate information to the Board and Grayson County Middle School.
- 4. Upon request of the administration of Grayson County Middle School, or upon request of the Superintendent of the Grayson County Public Schools, the Booster Club shall make available a full and complete list of its members.
- In addition to complying with the requirements of Title 702 of the Kentucky Administrative Regulations, Chapter 3:30 internal accounting, and all other relevant statutes and regulations, the Booster Club shall provide a full and complete accounting of all moneys raised, as well as a full and complete accounting of all moneys expended. In addition, upon request, the Booster Club shall also provide audited financial records concerning its activities.
- 6. The Booster Club shall advise the principal and coaches/sponsors of Grayson County Middle School of all fundraising activities planned for and receive Council approval of each event. The coach/sponsor shall be involved and informed of all Booster expenditures.

# HIGH SCHOOL ATHLETIC BOOSTER CLUB AGREEMENT

This agreement is entered into by ar	nd between the Grayson County Board of
Education (hereafter referred to as "board")	) and an entity known as Grayson County
High School	(hereafter referred to as the "Booster
Club"). Through this Agreement, the partie	es intend to set forth the Terms and Conditions
under which the Booster Club may operate	and associate with students, teachers, coaches
and school administrators at Grayson Coun	

### TERMS AND CONDITIONS

- 1. The Booster Club acknowledges that the Board is responsible for the promotion of education and the general health and welfare of all students attending the Grayson County Public Schools. In addition, the Booster Club acknowledges that the Board has control and management of funds and all public school property in its district and may use its funds and property to promote public education (KRS 160.290).
- 2. The Booster Club acknowledges that its activities may affect compliance with Title IX of the Educational Amendments of 1972 (Title 20, U.S.C. 1681-1687, et seq.) by Grayson County High School and the Board. Likewise, the Booster Club acknowledges that, as a condition of membership in the Kentucky High School Athletic Association, representatives of Grayson County High School and the Board must verify that the school complies with Title IX. 702 KAR 7:065, Section 2 (13). The Booster Club further agrees to refrain from engaging in any activity which, in the opinion of the principal or administration of Grayson County High School or the Superintendent of the Grayson County Public Schools, adversely affects the school's or the Board's ability to comply with Title IX.
- 3. The Booster Club shall, on or before August 15, each year, designate a representative for purposes of communicating with and providing true and accurate information to the Board and Grayson County High School.
- 4. Upon request of the principal or administration of Grayson County High School, or upon request of the Superintendent of the Grayson County Public Schools, the Booster Club shall make available a full and complete list of its members.
- 5. In addition to complying with the requirements of Title 702 of the Kentucky Administrative Regulations, Chapter 3:30 internal accounting, and all other relevant statutes and regulations, the Booster Club shall provide a full and complete accounting of all moneys raised, as well as a full and complete accounting of all moneys expended. In addition, upon request, the Booster Club shall also provide audited financial records concerning its activities.

# SCHOOL ACTIVITY FUND BOOSTER CLUB BUDGET

F-SA-4B

School Club Name			Year	
Club Address				
	Receipts		Expenditures	
Description	Prior Year Actual	Budget	Prior Year Actual	•
Beginning Cash Balance				
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Totals	<u> </u>			
Club Treasurer	-		Principal	
Club President	<b></b>	. <b>&gt;</b>		

Tuesday, November 27, 2007



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