



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

(For schools re-visited during the 2014-2015 school year)

School: Grayson County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: November 18, 2014
 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
	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 in the annual Title IX reports, the school has met the standard established in Test 1 for provision of athletic opportunities during each of the past three school years. The 2013-14 annual Title IX report shows that female students made up 47.5% of the school's enrollment, and they were 46.7% of the school's 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 rosters and information submitted in the annual Title IX reports show that the school has not met the standard established in Test 2 for provision of athletic opportunities during any of the past three school years. The 2013-14 report shows that one varsity team for females, archery, which has approximately 15 current participants, has 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 responses on the most recent T-3 form indicate that the standard established in Test 3 for provision of athletic opportunities is being met. However, there is some conflict in the information provided on the T-3 form (#5) and the data provided on the T-63 form in the most recent student athletic interest survey. The T-3 form states that the top two sports in which student interest was shown were swimming and bass fishing, but the T-63 form (student interest survey) shows zero interest in both of these sports.

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

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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>At the time of the October 30, 2002 school visit report, it appeared that the school was not meeting the standard established in any of the three opportunities tests and was rendered <i>Deficient</i>. The September 26, 2007 school visit report rated the school <i>Satisfactory</i> stating that it was likely meeting the standard established in Test 3. Recent annual Title IX reports indicate that the standard established in Test 1 has been met during each of the past three school years. School officials were complimented for maintaining the percentage of female participation at such a high rate while sponsoring a football program. The school currently offers 23 total teams for female participation and 22 total teams for males. It is also quite likely that the standard established in Test 3 is being met, but the conflicting information found on the T-3 and T-63 forms make it impossible to ascertain compliance. (See detailed explanation for all three tests on page 3 of this report.) The school's Title IX file was reviewed during the most recent visit and was found to contain the two previous Title IX school visit reports, annual Title IX reports for the past four years, a board-approved 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 varsity teams, game programs for volleyball, girls and boys basketball (combined), written and signed booster club agreements (see <i>Support Services</i>), facilities usage schedules for the gym and the weight training room (see <i>Scheduling of Games and Practice Times</i> and <i>KHSAA Recommended Action</i>), written regulations regarding displaying athletic accomplishments, provision of letters and bars, and criteria for induction into the school's Athletic Hall of Fame (see <i>Publicity</i>), written designation of the locker room and athletic equipment storage space assigned each team (see <i>Locker Rooms, Practice and Competitive Facilities</i>), written minutes for all Gender Equity Review Committee meetings held during the</p>

Accommodation of Interests and Abilities continued			past three years, a written uniform review, rotation, and/or replacement plan, guidelines relating to travel and per diem (see <i>Travel and Per Diem</i> and <i>KHSAA Recommended Action</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). The school's athletic director was commended for the development and maintenance of a comprehensive and well organized Title IX file.
Equipment and Supplies	X		The October 30, 2002 Title IX school visit report deemed this benefit category <i>Satisfactory</i> stating that a uniform review, rotation, and/or replacement plan was in place. The September 26, 2007 report again rated this category <i>Satisfactory</i> but documented that spending in this area favored male athletes. The most recent visit revealed that the school had a uniform review, rotation, and/or replacement plan based on a four-year cycle of review for all school sponsored sports except boys and girls golf and archery. These sports have their uniforms (shirts) replaced on an annual basis. All the uniforms seen during the most recent visit were of excellent quality and seemed to be supplied equitably in terms of quantity. According to the data submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$116 per female athlete and \$247 per male athlete for equipment and supplies. As was true at the time of the 2007 visit, these expenditures appear to favor male athletes and <u>should be closely monitored for the provision of parity.</u>
Scheduling of Games and Practice Time	X		Both the 2002 and 2007 school visit reports rated this benefit category <i>Satisfactory</i> . Information provided during the recent visit showed that the number of competitive events scheduled for "like" sports was comparable. The facility usage schedule for the gym showed equitable assignment. The school did not provide a usage schedule for the soccer field which is shared for practice and games by the boys and girls teams. (See <i>KHSAA Recommended Action</i> .) The scheduling of athletic events during the most optimal playing times was discussed with school officials who

			were commended for the provision of parity regarding this benefit.
Travel and Per Diem Allowances	X		This benefit category was designated <i>Satisfactory</i> by both the previous Title IX school visit reports. The 2007 report did request that the school's written regulations relating to this benefit category be expanded to include all athletic trips not just the overnight ones. Evidence provided during the most recent visit showed that the school had regulations that addressed the provision of meals and partially addressed lodging. These guidelines should also include equitable provision in regards to mode of transportation and quality of lodging. (See <i>KHSAA Recommended Action</i> .) According to the information provided in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$71 per female athlete and \$94 per male athlete for travel and per diem.
Coaching	X		Both the earlier Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The 2007 report noted that there was a disparity in the number of coaches provided for girls basketball (two) compared to boys basketball (four). The school's principal and athletic director are currently responsible for evaluating all head coaches. A written instrument is being developed for use in this endeavor and will be used beginning in the 2015-16 school year. The T-35 form in the 2013-14 annual Title IX report indicates that the total amounts spent for coaches' salaries for teams of "like" sports was comparable. A review of the district's extra service pay schedule for coaches showed parity. The T-35 form in the 2013-14 annual report shows that the number of coaches provided for teams of "like" sports is equitable. It shows that the ratio is one coach per 12 participants for female athletes and one coach per 12.5 participants for male athletes. Information provided during the visit showed that 78% (7/9) of head coaches of both boys and girls teams were on-campus employees.
Locker Rooms,	X		The previous two Title IX school visit reports

Practice and Competitive Facilities

Locker Rooms, Practice and Competitive Facilities continued

rated this benefit category *Satisfactory*. The 2007 report documented there was a disparity in locker room space assigned for female teams compared to male teams. At that time, the boys teams had three exclusive dressing rooms and the girls teams had none. The most recent tour of facilities revealed that since the 2007 visit, two of the girls locker room facilities that served five girls teams have had major renovations and upgrades. A small softball field house had been constructed which has an exclusive dressing room for softball. This dressing room is still not up to the level of the baseball dressing room but the newly constructed softball indoor hitting facility is superior to the one used by baseball. All the other indoor and outdoor competitive facilities appeared to provide comparable amenities. The school currently has four exclusive dressing rooms for boys compared to two for girls. This is an improvement over the situation cited in the 2007 report, but there is still need for continued progress. Athletic equipment storage space is still in short supply. All teams seemed to be assigned some storage space except boys and girls cross country. Upon receipt of this report, school officials are requested to assign some athletic equipment storage space for girls and boys cross country. The listing of storage space and locker room assignments in the Title IX file is to be revised to show the addition of cross country. School officials were encouraged to consider other modifications that would make this document more user-friendly.

Medical and Training Facilities and Services	X	<p>The 2002 Title IX school visit report judged this benefit category <i>Satisfactory</i> but did state that there was <u>no posted</u> usage schedule for the weight training facility, and there was a lack of training equipment appropriate for use by female athletes. The 2007 school visit report documented the school had an equitable usage schedule for the weight training room in the Title IX file and posted at the facility. Training equipment appropriate for female use had been added. The most recent visit revealed that the school had two weight training rooms. Room 1 is located in the football field house and is primarily used by football players. Weight Room 2 is located near the track and is used by all other teams. An equitable usage schedule for this facility was found in the Title IX file and posted at the venue. There was equipment in Weight Room 2 that was suitable for use by female athletes. Interviews with student athletes confirmed that this facility was used by at least four female teams. One coach of a female team raised concern about the cleanliness and maintenance of Weight Room 2. The services of an athletic trainer are provided by representative of Physical Therapy Solutions. This trainer attends some competitive events and is available at the local office to all student athletes on a daily basis. All student athletes are responsible for getting their own physical examinations.</p>
Publicity	X	<p>Both the previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i>. The school currently has one cheerleading squad that is assigned to cheer at all home football games and at away games versus district opponents. They also cheer at all post season games. During basketball season, they cheer at all home games for both the boys and girls teams and at all away games which are girl/ boy doubleheaders. The cheerleading squad also cheers at all post season games for both basketball teams. The dance team performs at <u>selected</u> home boys and girls basketball games as monitored by the athletic director for equity of support. The full school</p>

Publicity continued		<p>band performs at all home football games. The pep band performs at <u>selected</u> home boys and girls basketball games. This support is monitored by the principal for equity of support. The Title IX file contained written guidelines that indicated equity in posting of banners in the gym, induction into the school's Athletic Hall of Fame, and awarding of letters and bars. <u>Upon receipt of this report, the school should expand these guidelines to include the provision of athletic awards and post season banquets.</u> According to the information submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$15 per female athlete and \$21 per male athlete for awards.</p>
Support Services	X	<p>The 2002 Title IX school visit report rated this benefit category <i>Satisfactory</i>. The 2007 report designated this category <i>Deficient</i> stating athletic spending had been outside of generally accepted parameters for the provision of parity for the last three consecutive school years and that there had been insufficient administrative oversight of booster club expenditures. The school currently has booster clubs supporting all school-sponsored teams except archery, girls and boys tennis, and girls and boys track. These clubs house all their funds in off-campus bank accounts. The school has signed agreements with each booster club that specifically address fundraising activities. The agreements do not appear to provide evidence of any procedure for administrative oversight of expenditures for the provision of parity. <u>Upon receipt of this report, it is recommended that school officials attempt to expand the booster club agreements to include stipulations for administrative oversight of booster expenditures for provision of equitable benefits.</u> An analysis of athletic spending for the past two years shows that in 2012-13, 41% of the expenditures were for female athletes who made up 45% of the participants and 59% of the expenditures were for male athletes who made up 55% of the participants. This translates into approximately \$567 being spent for each female athlete and \$673 for each male athlete. In 2013-14, 46% of spending was</p>

Support Services continued			for females who made up 47% of the participants, and 54% of spending was for male athletes who made up 53% of the participants or approximately \$529 per female athlete and \$552 per male athlete. Over this two-year period, these expenditures appear to be within generally accepted parameters for the provision of parity on both a percentage and per athlete basis for a 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 Improvement Plan (Form T-60)

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

- upgrading the softball locker room;
- constructing a new fence at the softball field;
- adding the sport of archery for males and females;

- upgrading the soccer facility;
- re-surfacing the tennis courts;
- developing a coaches' handbook.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the November 18, 2014 Title IX school visit. There were "areas of concern" in relation to oversight of booster club spending (see *Support Services*), equitable scheduling of shared facilities (see *Scheduling of Games and Practice Times* and *KHSAA Recommended Action*), equitable provision of athletic awards and post season banquets (see *Publicity*) equitable provision of athletic equipment storage space (see *Locker Rooms, Practice and Competitive Facilities*), and equitable provision of transportation and overnight lodging (see *Travel and Per Diem* and *KHSAA Recommended Action*). Improvements in these benefit categories will help to insure a continuation of equitable provision.

7. KHSAA Recommended Action in relation to new deficiencies

No new deficiencies were designated in the body of this report. It is requested that the school address the following issues in an attempt to provide equitable benefits.

(Scheduling of Games and Practice Times) On or before February 27, 2015, the school is to submit to KHSAA an equitable usage schedule for the soccer field that is used for practice and competitive events by both the boys and girls soccer teams.

(Travel and Per Diem Allowances) On or before February 27, 2015, the school is to submit to KHSAA an expansion of the current written regulations for travel and per diem that address equitable provision in relation to the mode of transportation and the quality of overnight lodging for student athletes. This expansion should also be a part of the Title IX improvement plan (T-60 form) submitted as part of the April 30, 2015 annual Title IX report.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency designated in the area of Support Services by the September 27, 2007 Title IX school visit report appears to have been addressed by the implementation of written booster club agreements. The analysis of athletic spending for the past two years (2012-13 and 2013-14) seems to show more equity than in school years 2005-06 and 2006-07. As noted in this report, this area still needs improvement in relation to oversight of booster club spending (see *Support Services*).

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

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

District Level Title IX Coordinator: Sheila Meredith. 790 Shaw Station Rd., Leitchfield, KY 42754
(270) 259-4011

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 875-3817
Logan Ramsey	Student Athlete	(270) 259-4078
Jessica Johnson	Student Athlete	(270) 259-4078
Sherry Vincent	Tennis Coach	(270) 259-4078
Nancy Mudd	Volleyball	(270) 259-4078
Josh Basham	Athletic Director	(270) 259-4078
Sheila Meredith	District Title IX Coordinator	(270) 259-4011
Todd Johnston	Principal	(270) 259-4078
Lisa Skaggs	Parent	(270) 589-1805

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:25 pm CST.