



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

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

School: Harlan Independent  
 Prepared By: Barbara Kok  
 Date of Re-Visit: October 10, 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
- Improvement 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
	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 data and reports submitted for the years 2012-2013, it appears that Harlan Independent High School has not met the standard for Test 1 for the provision of athletic opportunities.

- 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 data and reports submitted for the years 2012-2013, it appears that Harlan Independent High School has not met the standard of Test 2 for the provision of athletic opportunities.

- 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 data and reports submitted for the years 2012-2013, it appears that Harlan Independent High School has met the standard for Test 3 for the 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:

According to the submitted reports, the most recent Student Interest Survey was conducted during the 2011-2012 school year. Students in grades 8 thru 11 were surveyed with a return rate of 81%.

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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		According to the data provided on the 2012 Student Interest Survey, students in grades 8 thru 11 were surveyed with a return rate of 81%. There are currently 13 sport level opportunities for females and 9 for males.
Equipment and Supplies	X		<p>Uniforms viewed appeared to be of good quality and equivalent in quantity. Interviews conducted with athletes and coaches indicated uniforms were replaced on a 4 year rotation but a written policy was not present in the Title IX file.</p> <p>(see KHSAA recommendation a.)</p> <p>All other viewed equipment appeared to be equivalent in quality and quantity.</p> <p>Information submitted in the 2012-2013 Annual Report, form T35, showed a significant difference in spending for male athletes and female athletes. This difference and methods to assess and alleviate the difference was discussed with the administration and Gender Equity Committee. This issue should be addressed in the 2013-14 Annual Report Improvement Plan.</p>
Scheduling of Games and Practice Time	X		Equitable written plans were present regarding scheduling of games and practice times for basketball and volleyball. Up to date schedules for all sports were available in the Title IX file.
Travel and Per Diem Allowances	X		<p>There was no written policy for travel and per diem available for viewing in the Title IX file that provided for equivalence and administrative oversight.</p> <p>(see KHSAA recommendation b.)</p> <p>Interviews with coaches and athletes indicated the use of school buses for transport and the opportunity of overnight trips for competitive events.</p> <p>Administrators and the athletic director were</p>

			asked to review future reported expenditures in this area. Travel expenditures for cross country, golf and track were reported as zero dollars on the 2012-2013 Annual report (T35 form).
Coaching	X		There was written evidence of a school board approved pay schedule that showed equivalence and parity in salary and number of coaching positions for like sports. The current ratio of coach to athlete is 11:1 for males and 14:1 for females. A review of the number of on-campus and off-campus coaches showed equitable access for male and female athletes.
Locker Rooms, Practice and Competitive Facilities	X		<p>Volleyball, and girls basketball and boys basketball practice and compete in the gymnasium located on campus. There was viewed evidence of recent upgrades (painting, lockers) in the girl's locker room. A small weight room is adjacent to the boy's locker room.</p> <p>Other sports practice and compete approximately 1 mile from the school at the Joe Gilley Sports complex. There are 6 lighted tennis courts that are well maintained. Harlan Independent is to be commended for their major improvements to the softball field. Plans for an additional concession stand have been addressed in their Improvement Plan.</p> <p>A locker room, weight room and storage are located in the football field house. There is a 6 lane track that is in need of resurfacing and lining. Administrators indicated there are plans being made and adopted to construct a new field house that would provide additional storage and locker room space to be shared with track and baseball.</p> <p>Written assignments for shared facilities, locker rooms, and storage were not present in</p>

			<p>the Title IX file.</p> <p>(see KHSAA recommendations c.)</p>
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<p>Medical and Training Facilities and Services</p>		X	<p>In the two previous audits, Harlan Independent was given deficiencies in this benefit area. There appears to have been no improvements in the weight room situation. Presently the two weight rooms are not easily accessible for female athletes. The weight rooms are equipped with free weights and machines that are not “female friendly” and appropriate for female athletes. During the interview segment the coaches and athletes said they would be more inclined to use the weight room on campus if it was located elsewhere and had appropriate equipment. They currently purchase memberships to a local gym. There was no written and posted evidence of a weight room use schedule.</p> <p>(see KHSAA recommended action in relation to reoccurring deficiencies 6 and 8)</p> <p>Due to the costs of contracting an athletic trainer Harlan Independent does not have a full time trainer or training room. Physical therapists from a local company (PTPro) provide services at home games and athletes can be referred for treatment of injuries.</p> <p>There was no Emergency Plan for each athletic venue available for viewing.</p>
<p>Publicity</p>	X		<p>Harlan Independent has one cheerleading squad that cheers all home games for football, girls and boys basketball, as well as post season contests.</p> <p>Interviews with athletes and coaches indicated that all teams had post-season awards banquets. There was no written evidence for the provision and criteria of earned awards, or other types of possible recognition (i.e. retired</p>

			<p>jerseys, rings, picture display) or addresses post-season banquets. There was no written evidence of an awards guideline that indicated criteria for banner recognition and display. (see KHSAA recommendation d.)</p> <p>An accurate review of a two year spending pattern for awards could not be determined as there was a majority of '0' amounts reported in the area of Awards on the 2010-11 and 2012-13 Annual report. (see KHSAA recommendation e.)</p>
Support Services		X	<p>According to the data and information submitted in the 2012-2013 Annual Report overall spending strongly favors the male athletes with the difference being \$365 more per male athlete. This is the third consecutive year in which this disparity has taken place. During interviews and discussions with the Superintendent, athletic director and principal, it appears that in part this may be due to misreporting in some areas on the Annual Report. It is imperative that the administrators, principal, and athletic director work with the Gender Equity Committee to develop an Improvement Plan that addresses this issue.</p> <p>(see KHSAA recommended action in relation to reoccurring deficiencies 6 and 8)</p> <p>Interviews with coaches and the athletic director indicate there is a Football booster club with all other teams having in school sports accounts.</p>
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)

\* Construct a concession stand for softball that will also contain additional bathroom facilities. Due to be completed by softball season (**February 15, 2014**).

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

The weight rooms are not easily accessible for female athletes due to their location (boys locker room, football field house) and appeared to be equipped with hand weights and bars that are appropriate for male athletes only. This is benefit area was deemed deficient in the 2000 and 2008 audits.

Harlan Independent has a reoccurring pattern (3 years) of overall spending that appears to strongly favor male athletes. Information and data submitted for the 2012-13 Annual Report demonstrates the largest disparity with \$365 more spent on male athletes than female athletes.

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

Although the following items are not deficiencies they need to be completed:

a). Please submit to the KHSAA no later than **December 15, 2013**, a written plan for uniform review and /or replacement for all teams and that will show equivalence in the purchase cycle for all teams. This plan should be included in the permanent Title IX file.

b). Please submit to the KHSAA no later than **December 15,2013**, a plan for travel that includes mode of transportation, parameters for housing for over night stay, and allowance for per diem that will ensure parity for all. This plan should be included in the permanent Title IX file.

c). Please submit to the KHSAA no later than **December 15, 2013**, written assignment of locker rooms, storage spaces, and offices to ALL teams that ensures equity for all. This information should be included in the permanent Title IX file.

d). The Gender Equity Review Committee should develop awards guidelines to include provision and criteria for school earned awards or other possible recognitions (i.e., retired jerseys, rings, picture display) that ensure equity for all. This policy should include criteria for display of banners in the gymnasium. Please submit to the KHSAA this policy by **December 15, 2013**. This policy should be placed in the permanent Title IX file.

e). Upon receipt of this report, school administrators along with the Gender Equity Committee should review the expenditures reported on form T35 in 2012-2013 for the area of Awards, Travel, and facilities for all teams.



8. KHSAA Recommended Action in relation to reoccurring deficiencies.

Please submit to the KHSAA, no later than **December 15, 2013** written evidence of the process and procedure to address the deficiency in the weight room concerning accessibility for female athletes and appropriate equipment for such athletes. This plan of action should be supported by the Administration, athletic director and members of the Gender Equity Committee and included in the 2013-14 Annual report Improvement plan.

Please submit to the KHSAA, no later than **December 15, 2013**, written evidence of the process and procedure for administrative oversight in the benefit expenditure areas of equipment/supplies, travel/per diem and awards that will ensure parity for all athletes. It is also recommended that the Gender Equity Committee become aware of all items that can be included in regard to the expenditures in said categories of equipment/supplies, travel/per diem, and awards. Full and accurate reporting of expenditures is important in determining the overall equivalence in spending. All documentation should also be included in the school's Gender Equity Committee minutes and part of the permanent Title IX file and included in the 2013-14 Annual Report Improvement Plan.

9. 9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: J.B. Donahue

District Level Title IX Coordinator: Charles D. Morton

Name	Title	Telephone
Madison Brewer	Student athlete	606-573-8750
Drew Parks	Student athlete	606-573-8750
Joe Meadors	Board Chairman	606-573-9239
Charles Morton	Superintendent	606-573-8700
J.B Donahue	Athletic Director	606-573-8750
Britt Lawson	Principal	606-573-8750
Barbara Kok	KHSAA auditor	
Gordon Bocoock	KHSAA auditor	

10. Comments

The athletic program at Harlan Independent High School appears to be well supported and a great source of pride in the school and community. Student athletes and coaches felt the athletic department was committed to maintaining equity for male and female athletic teams.

The administrators, principal, and athletic director were all very receptive to the KHSAA audit team and the information provided. They appeared to be aware of problem issues and willing to hear improvements needed to meet standards that ensure equity and parity for all. The Gender Equity Committee members were involved in discussions and were eager to work toward any improvements possible. The auditors emphasized the need to include members of the Gender Equity Committee in the process of establishing needed written policies.

All written policies, minutes from Gender Equity Committee meetings, past audit reports and five years of Annual Reports should be compiled into a permanent Title IX file. A copy of this file should be maintained in the main office and a copy with the athletic director.

The public forum, scheduled for 3:00 p.m. was held in the teacher workroom. With no one in attendance, the audit team left Harlan Independent High School at 3:15 p.m.