



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

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

School: Henry Clay High School
 Prepared By: Kathy Johnston and Gary Lawson
 Date of Re-Visit: January 13, 2015
 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 submitted data and reports for the years 2011-2014, it appears that Henry Clay High School does not meet the standard of Test 1 for the provision of athletic opportunities. The 2013-14 Annual Title IX Report shows that females were 49.3% of the school's enrollment and 35% 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: According to the submitted data and reports for the years 2011-2014, it appears that Henry Clay High School does not meet the standard of Test 2 for the provision of athletic opportunities. The T-2 form of 2013-14 Annual Title IX Report shows that the school has added two (2) varsity teams (archery and bowling) for females, with approximately ten (10) participants 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: According to the submitted data and reports submitted for the years 2011-2014, it appears that Henry Clay High School has met the standard of Test 3 for the provision of athletic opportunities. The responses on the T-3 form appear to be supported by the information provided in the most recent Student Interest Survey.

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

Comments: The information provided on the T-63 form of the 2013-14 Annual Title IX Report shows that a 100% completion rate was received on the most recent Student 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>Both the December, 1999 and the February, 2009 Title IX school audit reports rated this benefit category satisfactory. It appeared, at the time of both visits, that the school was meeting the standard established in Test #3 for the provision of athletic opportunities. Evidence provided in the annual Title IX reports for the past three years give strong indication that the standard of Test #3 is still being met. The responses on the T-3 form and the information provided from the Student Interest Survey show that the athletic interests of students at the school are being accommodated. In 2013-14, all sanctioned sports for girls were offered with a total of 19 teams. Total number of boys teams equaled 22. The need to monitor the indicated interest in field hockey was discussed with school officials. During the visit, the school's Title IX file was inspected. It was found to contain written guidelines and regulations pertaining to almost all Title IX benefit categories. These guidelines were comprehensive and well written.</p>
Equipment and Supplies	X		<p>The December, 1999 school visit report rendered this benefit category as satisfactory. The February, 2009 visit report gave this category a 'deficiency' rating, stating that interviews during the visit indicated that the school's uniform rotation plan was not being followed by all teams. During this visit, there was written evidence of a four (4) year uniform review plan for replacement and/or purchase. Viewed uniforms during the visit were of high quality and appeared to be supplied in equitable quantities. Interviews with students and coaches indicated knowledge of the uniform plan. The uniform plan also indicated that student athletes in the sports of archery, bowling, golf, swimming, and tennis purchase and retain their own uniforms on a yearly basis. According to the information provided in the</p>

			2012-13 and 2013-14 Annual Title IX Reports, the school was spending \$67.00 per female athlete compared to \$106.00 per male athlete for the provision of equipment and supplies.
Scheduling of Games and Practice Time	X		<p>The December, 1999 Title IX school visit report deemed this benefit category to be 'deficient' stating that the school was not providing 'equivalence' in relation to opportune playing dates for all teams. The February, 2009 report gave this category a satisfactory rating and documented that opportune playing time had increased for female teams. For this visit, there was viewed evidence of all sport schedules which showed comparability and equivalence with regard to the number of competitive event opportunities. There was viewed evidence, in the file, for the shared facilities of the gymnasium, stadium field, and front field areas. A schedule showing shared use of the indoor hitting facility was presented, however, it was not in the file, nor posted at the site. School officials were commended for the provision of equity in relation to scheduling of opportune playing time over the past two years.</p> <p>(see recommendation 6.)</p>
Travel and Per Diem Allowances	X		<p>The December, 1999 Title IX school visit designated this benefit category to be 'deficient' stating that the 'adequacy of transportation for a number of girls teams was insufficient'. The report also stated that a 'greater number of boys teams used charter buses'. The February, 2009 school visit deemed this category satisfactory but did document that the school still did not have an equitable written guideline for the provision of per diem for student athletes. During this visit, there was written evidence of a travel and per diem guideline that provided the specifics for mode of transport, meal allowance, and the specifics relative to hotel/overnight stay. The information submitted in the 2012-13 and 2013-14 Annual Title IX reports show that the</p>

			<p>school was spending \$22.00 per female athlete compared to \$34.00 per male athlete for the provision of travel and per diem. Interviews with administration indicated possible errors relative to the travel expenditure information submitted on the T-35 form of the 2013-14 Annual Report</p> <p>(see recommendation 6.a.)</p>
Coaching	X		<p>The December, 1999 Title IX report visit rendered this benefit category to be 'deficient' stating that 'coaches of boys teams had significantly more experience than coaches of girls teams'. The February, 2009 Title IX report appraised this category to be satisfactory. At this visit, there was viewed evidence of a school board approved salary which showed overall equivalence in the salary provided and comparability with regard to the number of provided coaching positions. However, due to insufficient and/or incorrect data submitted on the T-35 form of the 2014 Annual Report, it is difficult to determine overall equivalence, specific to Henry Clay High School. The approximate athlete to coach ratio, with regard to accessibility, is 9:1 for females and 10:1 for males. Written evaluation tools are used for all head coaches at the end of each sports season. These evaluations are conducted by school administration and the athletic director.</p> <p>(see recommendation 6.b.)</p>
Locker Rooms, Practice and Competitive Facilities		X	<p>Both the December, 1999 and the February, 2009 Title IX school visit reports deemed this benefit category to be 'deficient'. Both reports cited major differences in the amenities provided at the softball field when compared to the baseball field. The 2009 report also documented that there was no usage schedule for the indoor hitting facility. The report also noted that the girls appeared to need more lockers and equipment storage space. On this visit, there was written evidence of locker room</p>

		<p>assignment for all teams and viewed locker rooms appeared to be equitable and with similar amenities. There was also written assignment of storage space designated for all sponsored teams. Off campus competitive facilities include Lakeshore and Andover Golf Course for boys and girls golf, Transylvania College for boys and girls swimming, Southland Bowling Lanes for boys and girls bowling, and the Speech and Hearing Center (former elementary school) for wrestling. All viewed practice and competitive facilities appear to be very well maintained. In response to the audits of 1999 and 2009, it appears the areas of concern relative to numbers of lockers and storage has been addressed, however, there appears to be continued disparity between the amenities of baseball and softball competitive areas. The most significant ones are that the softball team shares a locker room located inside the school building while the baseball team has an exclusive locker room located at the baseball field area. Another is that there is a named baseball/softball indoor hitting facility, however, a schedule showing equitable usage was not in the file, nor posted at the site. Also, the display of all recognition in the hitting facility showed a significant support for baseball, only. Interviews with student(s) athletes conveyed the attitude that this was a 'baseball facility'. Noted differences between the amenities of baseball and softball include the detail of provided scoreboard game information and the availability of a restroom and expanded coaching office area in the baseball press box.</p> <p>(see recommendation 6.)</p>
--	--	---

Medical and Training Facilities and Services	X		<p>Both the December, 1999 and the February, 2009 Title IX school visit reports designated this benefit category to be 'deficient'. Both reports stated that there appeared to be an inequitable provision in relation to the weight training facilities. At this visit, there was viewed evidence of four (4) weight rooms. Three are located adjacent to the stadium field in the athletic concession building. The fourth is located in the football field house. All weight rooms provide ample space, equitable access and are housed with appropriate equipment for female use. Interviews with coaches and students indicate use of the weight room(s). There was written evidence of an equitable schedule showing usage and access in the Title IX file and posted at each site. Interviews with administration indicated that daily athletic training services are provided through a contract with the University of Kentucky Sports Medicine. A large, well-equipped training room is located next to the gymnasium in the main school building. A schedule showing access and availability was posted at the training room site. Physical exams for athletes are made available two (2) times a year, at a reduced cost, for the students at Henry Clay High, as part of the contract with UK. There was viewed evidence of emergency action plans and procedures for all athletic facilities.</p>
Publicity	X		<p>The December, 1999 Title IX school visit report rated this benefit category as 'deficient' because of the advantages that existed for male athletes. The February, 2009 Title IX report designated this category as satisfactory, but did report that the awards guideline was not completely inclusive. On this visit, there was written evidence of an inclusive awards guideline that provided the specifics for banner display, end-of-season banquets, bars/letters, athletic/academic achievement, and hall of fame recognition. There was also written evidence that provided for the administrative oversight relative to the support groups of cheerleading and band. According to the</p>

			information provided in the 2012-13 and 2013-14 Annual title IX Reports, the school was spending \$44.00 per athlete on awards for both male and female participants.
Support Services	X		<p>The December, 1999 Title IX school visit report deemed this benefit category to be 'deficient' because the school gave the male athletes the advantage in this area on the T-41 but they did not address the advantage in the Title IX Improvement Plan. The February, 2009 Title IX report judges this category to be satisfactory but did state that 'it appeared that the school did not have a clear plan for monitoring booster expenditures'. The school currently has booster clubs for all school sponsored teams except archery, bowling, and bass fishing. Interviews with administration indicate that all booster clubs house their funds off the school campus. An analysis of spending for the past two (2) years shows that in 2012-13, athletic expenditures were outside the acceptable parameters for the provision of parity on both a percentage and per athlete basis. In 2013-14, the data submitted on the T-35 form indicated that the school was spending approximately \$210.00 per female athlete compared to \$275.00 per male athlete for total support.</p> <p>(see recommendation 6.c.)</p>
Athletic Scholarships			N/A

Tutoring			N/A
Housing and Dining Facilities and Services			N/A
Recruitment of Student Athletes			N/A

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

- Monitoring of booster expenditures for provision of equitable benefits
- Use of evaluations for each coach of every sport
- Keeping accurate minutes of Gender Equity Committee meetings
- Upgrading of equipment storage areas
- Striving to provide equitable opportunities

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

Locker Room, Practice, and Competitive Facilities - Although some improvements have been made in this area, there continues to remain a disparity between the provisions viewed at the baseball and softball fields. These include, but may not be limited to, the lack of a softball locker room at the field, the lack of a viewed and posted usage schedule for the indoor hitting facility, and the difference in the amenities provided comparing the softball and baseball scoreboards, and press box areas. (see 8. below)

Although the following are not deficiencies, they are recommendations that need to be addressed to ensure overall equivalence:

- a. Please submit to the KHSAA, **no later than March 15, 2015**, an accurate reporting of the expenditures for the category of Travel (T-35 form) as requested for the 2013-14 Title IX Annual Report.
- b. Please submit to the KHSAA, **no later than March 15, 2015**, an accurate reporting of the expenditures for the category of Salaries (T-35 form) as requested for the 2013-14 Title IX Annual Report.
- c. Please submit to the KHSAA, **no later than March 15, 2015**, a guideline outlining a process and/or procedure for school administrative oversight and/or approval of booster club expenditures.

7. KHSAA Recommended Action in relation to new deficiencies

N/A

8. KHSAA Recommended Action in relation to reoccurring deficiencies

- a. Please submit to the KHSAA, **no later than March 30, 2015**, a projected plan of development relative to the addition of a locker room at the softball field area. This plan should include, but not be limited to, a timeline with drawings and documentation as submitted and approved by the local school board.
- b. Please submit to the KHSAA, **no later than March 30, 2015**, an equitable schedule of usage for the indoor baseball/softball hitting facility. This schedule should show designated dates and times for use by each team and should also be signed by the head coaches of both (baseball and softball) teams and the athletic director.
- c. Please submit to the KHSAA, **no later than March 30, 2015**, the development of an improvement plan that may address the difference in the amenities between the softball and baseball fields, that may include, but not be limited to, the scoreboard, coaching office/press box area, and outdoor hitting area.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Nicole Silimperi 859-381-3423

District Level Title IX Coordinator: Donnie Adkins 859-381-4000

Name	Title	Telephone
Anna Hensley	Student Athlete	859-381-3423
Logan Cox	Student Athlete	859-381-3423
Dale Grupe	Volleyball Coach	859-381-3423 x1123
Eric Sanford	Girls Basketball Coach	859-381-3423 x1130
Nicole Silimperi	Asst. Athletic Director	859-381-3423
Brady Thornton	Associate Principal	859-381-3423
Amanda Christensen	Athletic Director	859-381-3423
Elden Cox	Parent	859-806-3661
Gary W. Lawson	KHSAA Auditor	502-545-3393
Kathy Johnston	KHSAA Auditor	859-494-2509 kjohnston@khsaa.org

10. Comments

School administration and staff were very welcoming and well prepared for the visit. Interviews with students, coaches, and administration appear to be very committed to ensuring the overall equivalence relative to the opportunities and benefits provided to the students of Henry Clay High School.

The public forum, scheduled for 3:00 p.m., was held in the high school library. With no one in attendance, the audit team left the school at approximately 3:20 p.m.