

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

(For schools re-visited during the 2006-2007 school year)

School: **Highlands High School**  
 Prepared By: **Gary W. Lawson**  
 Date of Re-Visit: **January 24, 2007**  
 Telephone Number of Reviewer: **(502) 875-3817**  
 Reviewed By: **Larry G. Boucher**

**1. Completed Required Forms**

- Verification of Forms (Form GE-50) Yes  No
- Participation Opportunities Summary Chart (Form T-70) Yes  No
- Benefits Summary Charts (Forms T-71 & T-72) Yes  No
- Benefits Publicity (Form T-73) Yes  No
- Corrective Action Plan Summary Charts (Form T-74) 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
<b>X</b>	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 data submitted by the school, it has not met the standard established in Test #1 for provision of athletic opportunities during any of the past three school years.**

- 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 data submitted by the school, it has not met the standard established in Test #2 for the provision of athletic opportunities during any of the past three school 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 school's responses on the T-3 indicate that it has met the standard established in Test #3 for the provision of athletic opportunities during all of the past three school years. These responses are supported by the fact that the school sponsors all sanctioned sports for girls at the varsity level and offers 21 total teams for male participation and 21 total teams for female participation.**

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

**Comments: The school's annual report to KHSAA indicates that only a 63% return rate was received on its most recent survey. A minimum of 80% is required. (See KHSAA Recommended Action.**

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

<b>Benefit to Students</b>	<b>Satisfactory</b>	<b>Deficient</b>	<b>Comments</b>
<b>Accommodation of Interests and Abilities</b>	<b>X</b>		<p>School reported data indicates that it has not met the standard established in Test #1 or Test #2 for provision of athletic opportunities during any of the past three school years. By virtue of the fact that the school currently offers all sanctioned sports for girls at the varsity level and also sponsors a total of 21 teams for female participation and 21 teams for male participation, it appears to have met the standard established in Test #3 for provision of athletic opportunities during all of the past three school years. KHSAA officials reviewed the school's Title IX file. The file was found to contain all school reports to KHSAA, a board approved coaches salary schedule, sample game schedules for all teams, a school athletic handbook, a written booster club agreement, facility usage schedules, team practice schedules, written guidelines regarding awards and athletic recognition, designation of assigned locker and equipment storage space, written minutes for GERC meetings, a uniform review/replacement plan, and written guidelines relating to travel and per diem allowances. School officials were commended for excellent development and maintenance of the Title IX file.</p>
<b>Equipment and Supplies</b>	<b>X</b>		<p>The school review showed that a high quality uniform and adequate equipment was supplied for all athletic teams at Highlands. The school has a written uniform review/replacement plan based on a five-year rotation. School administrators were requested to address the apparent disparity in spending for athletic equipment that is indicated on the 2005-06 annual report to KHSAA.</p>

<b>Scheduling of Games and Practice Time</b>	<b>X</b>		All shared athletic facilities appeared to be rotated equitably. Prime time playing opportunities for girls was discussed. A review of the school's 2005-06 girls basketball schedule showed that 40% (4/10) of their home games were played on prime dates. The 2006-07 schedule indicates that 64% (7/11) of their girls home games are to be played on prime dates and all seven of the prime date games are to be played during the "prime time" slot. School officials were encouraged to continue to emphasize scheduling of prime time opportunities for girls.
<b>Travel and Per Diem Allowances</b>	<b>X</b>		The school's Title IX file included written guidelines for equitable provision of travel and per diem allowances. The school's 2005-06 annual report indicated that it was spending approximately \$52 per female compared to approximately \$97 per male athlete for travel and per diem.
<b>Coaching</b>	<b>X</b>		A review of the school district's extra service pay schedule for coaches appeared to show parity. School officials emphasized their desire to employ and keep competent coaches for all sports. The school's re-visit form indicated that 22% (2/9) of the girls head coaches were off-campus employees compared to 56% (5/9) of the boys coaches. The girls appeared to have the advantage in relation to accessibility of coaches.
<b>Locker Rooms, Practice and Competitive Facilities</b>	<b>X</b>		The original school report (January 22, 2002) rendered the school deficient in this area mainly due to the lack of benefit amenities provided at the softball field, apparent inequitable provision of equipment storage space, and inequitable provision of dressing facilities for girls teams. The most recent school visit showed a new dressing room provided for girls teams which is not shared with PE classes. The visit also showed that although there is a definite lack of total storage space at the school, the space available is divided equitably. Improvements added at the softball field include a new back stop, an access road to the field, and a portable outfield fence. The fact that the football team now has a practice field and no longer needs to use the outfield is also an improvement. KHSAA officials were provided a written district plan to add dugouts by the beginning of the 2007 softball season. (See KHSAA Recommended Action.) The school appeared to show improvement in this area.

<p><b>Medical and Training Facilities and Services</b></p>	<p><b>X</b></p>	<p>The January 22, 2002 report requested that the school develop a usage schedule for the weight training room. The school has a schedule in its Title IX file but that schedule was not posted at the facility. <u>School officials were alerted to the need for the usage schedule to be posted at the facility itself.</u> The school's weight training room appeared to have quite a bit of equipment that could be used by female athletes. Discussion with coaches and other school personnel indicated usage by several female teams. A certified athletic trainer is made available to all school teams through St. Elizabeth Sports Medicine.</p>
<p><b>Publicity</b></p>	<p><b>X</b></p>	<p>The January 22, 2002 school report indicated some disparity of support by cheerleaders and the school's pep band. These disparities appeared to be addressed by the school's 2002 Corrective Action Plan. Currently, the school sponsors three cheerleading squads—varsity, junior varsity, and freshman. The varsity squad cheers at all varsity football games—home and away. It also cheers at all home and away varsity boys and girls basketball games and all post season tournament games for both boys and girls. The junior varsity squad cheers during the first half of all home varsity football games. It also cheers at all home boys and girls junior varsity games. The freshman squad cheers at all home freshman football games and all boys and girls freshman basketball games at home.</p>

<b>Support Services</b>		<b>X</b>	At the time of the original school visit in January, 2002, this area was difficult to evaluate due to the school's failure to include booster club spending in its submittals to KHSAA. The school currently has one booster club and the athletic director approves all booster purchases. Since the school year 2002-03, annual reports have shown a consistently large disparity in spending for athletic benefits. For example, in 2004-05, figures show that approximately \$292 was spent per female athlete compared to \$464 per male athlete for total support. In 2005-06, approximately \$693 per male athlete was spent compared to \$311 per female athlete. Expenditures in and of themselves are not a benefit, but are a major indicator of amenities provided. Because this disparity is so large and has been shown over a period of more than two years, it must be addressed by school officials. (See Recommended Action.)
<b>Athletic Scholarships</b>	<b>NA</b>		
<b>Tutoring</b>	<b>NA</b>		
<b>Housing and Dining Facilities and Services</b>	<b>NA</b>		
<b>Recruitment of Student Athletes</b>	<b>NA</b>		

5. **Brief Summary/Analysis of the Corrective Action Plan (Form T-60)**

The school's Corrective Action Plan for the past three years called for the following:

- Formation of a female coaches office
- Improvement in the locker room facility for female athletes
- Improvement in publicity for girls sports
- Addition of a freshman girls soccer team
- Purchasing more hurdles for the track program
- Increasing pay for soccer coaches
- Addition of a paid softball coach
- Adding a new surface to the softball outfield
- Improving softball backstop
- Improving softball stands

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

The major deficiency designated by the most recent school visit is in the area of Support Services in relation to total spending for athletic benefits.

Although not a deficiency at this time, in the area of Accommodation of Interests and Abilities, the school needs to increase the number of returned student athletic surveys to at least 80%--the minimum required by KHSAA.

Another "area of concern" that should be addressed is the completion of the dugouts at the softball field according to the written plan developed by the school.

7. KHSAA Recommended Action in relation to new deficiencies

**(SUPPORT SERVICES)** On or before April 15, 2007, the school is to submit a letter to KHSAA showing what specific areas of *support* it is addressing in relation to the spending disparities over the past two years in provision of athletic benefits. The second part of the letter should be a description of the school's plan for addressing this disparity in order to provide equity in this area. This analysis should also be a part of the school's April 15, 2007 Corrective Action Plan submitted to KHSAA.

Although not designated as deficient, the following areas of concern are to be addressed by the school.

**(Accommodation of Interests and Abilities)** On or before April 15, 2007, the school is to submit a letter to KHSAA explaining how it will change the administration of its next student athletic survey in order to receive at least an 80% return rate.

**(Locker Rooms, Practice and Competitive Facilities)** On or before April 15, 2007, the school is to send pictures of the newly constructed dugouts at the softball field to KHSAA.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No re-occurring deficiencies were designated by the most recent visit. The deficiency in Locker Rooms, Practice, and Competitive Facilities that was designated in the January 22, 2002 report has been and continues to be addressed by school officials.



**9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING**

**High School Title IX Coordinator: Dale Mueller, 2400 Memorial Parkway, Ft. Thomas, KY  
(859) 781-5900 ext. 11172 41075**

**District Level Title IX Coordinator: Rita Byrd, #28 North Ft. Thomas Ave., Ft. Thomas, KY  
(859) 781-3333 ext. 10113 41075**

<b>Name</b>	<b>Title</b>	<b>Telephone</b>
<b>Gary W. Lawson</b>	<b>KHSAA</b>	<b>(502) 875-3817</b>
<b>Jamie Richey</b>	<b>Coach</b>	<b>(859) 781-5900</b>
<b>Kevin Nieporte</b>	<b>Coach</b>	<b>(859) 441-5222</b>
<b>Kelli L. Stuntebeck</b>	<b>Student Athlete</b>	<b>(859) 781-5900</b>
<b>Rita Byrd</b>	<b>District Title IX Coordinator</b>	<b>(859) 781-3333</b>
<b>Brad Fennell</b>	<b>School Board Member</b>	<b>(859) 781-7851</b>
<b>Willie Schlerman</b>	<b>Teacher/Coach</b>	<b>(859) 781-6343</b>
<b>Brenda Skaggs</b>	<b>Counselor</b>	<b>(859) 781-5900</b>
<b>Beth Hudepohl</b>	<b>Parent Representative</b>	<b>(859) 781-3277</b>
<b>Sally Walters</b>	<b>Teacher/Coach</b>	<b>(859) 441-5222</b>
<b>Michael Eaton</b>	<b>Student Athlete</b>	<b>(859) 442-7332</b>
<b>Elgin Emmons</b>	<b>Principal</b>	<b>(859) 781-5900</b>
<b>Dale Mueller</b>	<b>Athletic Director</b>	<b>(859) 781-5900</b>
<b>Martha Mullins</b>	<b>KHSAA</b>	<b>(859) 299-5472</b>

**10. Comments**

**No one from the community attended the public comments session. The meeting was adjourned at 5:20 p.m.**

# Highlands High School

Elgin Emmons  
Principal

Brian Robinson  
Assistant Principal

2400 Memorial Parkway  
Fort Thomas, Kentucky 41075  
Phone: (859) 781-5900  
Fax: (859) 442-4221

Ann D. Meyer  
Junior/Senior Counselor

Brenda W. Staggs  
Freshman/Sophomore Counselor

Dear Ms. DeVries,

This letter is the requested responses to the KHSAA Title IX Re-Visit Final Audit Report for Highlands High School. We appreciate the professional job that was done by the auditors and the assistance that they have given us, especially in the area of girl's sports. We are very proud of our back to back State Championship Girls Soccer Team and the rest of our highly competitive girl's teams. We appreciate the impact that the KHSAA and Title IX auditors have had on our female student/athletes.

The KHSAA asked us to show what specific areas of support have caused the spending disparities over the past two years. We have spent substantially more on boy's sports than we have on girl's sports. That has been the result of several spending decisions. The main reason would be football helmets. Three years ago we decided to have our starting varsity football players wear the new Riddell Revolution helmet. We believe that helmet is safer and reduces head injuries. It is a better but more expensive helmet. That created a problem in our community as coaches were deciding who got the Revolution helmets and who got the adequate but, in our option, inferior helmets. The last two years we have outfitted our entire team in grades 9 thru 12 with Revolution helmets with has increased our spending for boy's sports.

Football at Highlands has always tended to put us out of balance with regards to spending. We have had a highly successful program and have a large number of students who want to play on the team. We have also had a no cut policy and encouraged students to be a part of the team even if they were not a talented football player. With a helmet, shoulder pads, other equipment, and uniforms it costs us much more to equip a normal football player than other student athletes and with a substantially high number of students involved in football than other schools our size, we tend to spend more on boys sports.

Another area that has added to our spending disparities has been the transportation of our baseball team as compared to the softball team. Our district does not own school buses, except for special needs children. We therefore have to rent buses to transport our teams. Our softball varsity and jv teams play at the same site. They play both games at home or both away. Our baseball varsity and jv team play at different sites. If the varsity is at home, our jv plays the opponent away. So we have to rent a bus for transportation almost every day for the baseball team. The softball team has preferred to travel in the two

school vans. Therefore, we have been spending more in transportation for our baseball team than we have on softball.

To improve this spending discrepancy we are just simply going to spend less on boys and more on girls. We are creating a budget that will guarantee that these spending disparities are reduced and acceptable. We are in the middle of spending approximately \$30,000.00 to further improve our softball facility. We spent \$12,000.00 for our pole vault pit where we have more girls involved than boys. We are going to buy video equipment for our girls and boys golf teams. We are going to consider the spending disparity in all purchases that we make. We have made improvements right away. Our percentage of total expenditures dropped from 70 in 05/06 to 60.8% in 06/07.

It was also requested that we explain how we are going to administer our next student athletic survey in order to receive at least an 80% return rate. We accomplished this objective by giving the survey to all of our first period classes for 8<sup>th</sup>, 9<sup>th</sup>, 10<sup>t</sup>, and 11<sup>th</sup> grades. We made sure that they completed them and immediately collected them and returned them to the AD Office. We will continue to use this procedure in the future.

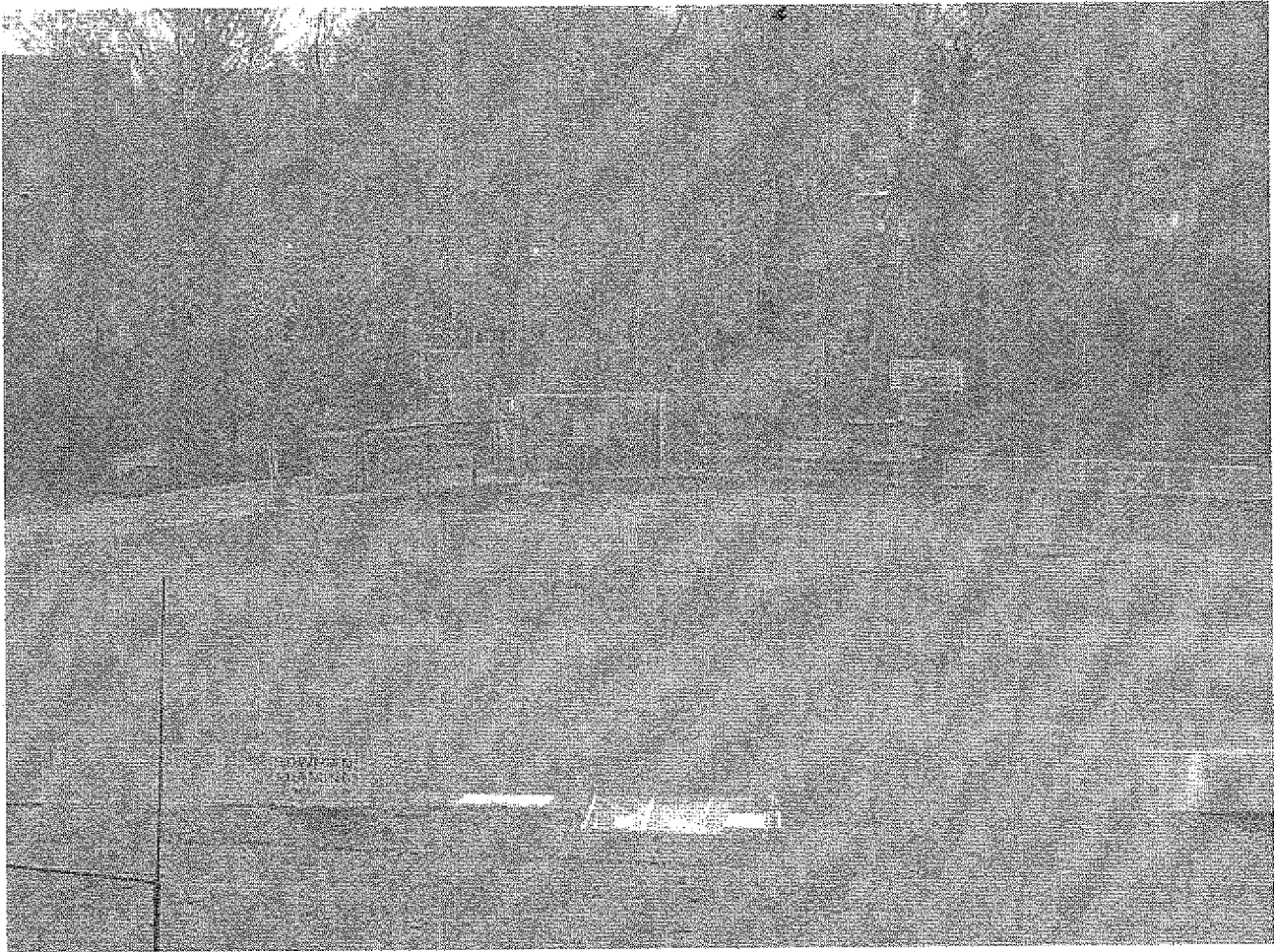
Enclosed are pictures of the newly constructed dugouts and shed at the softball complex. Our girls are extremely excited about the additions to the field.

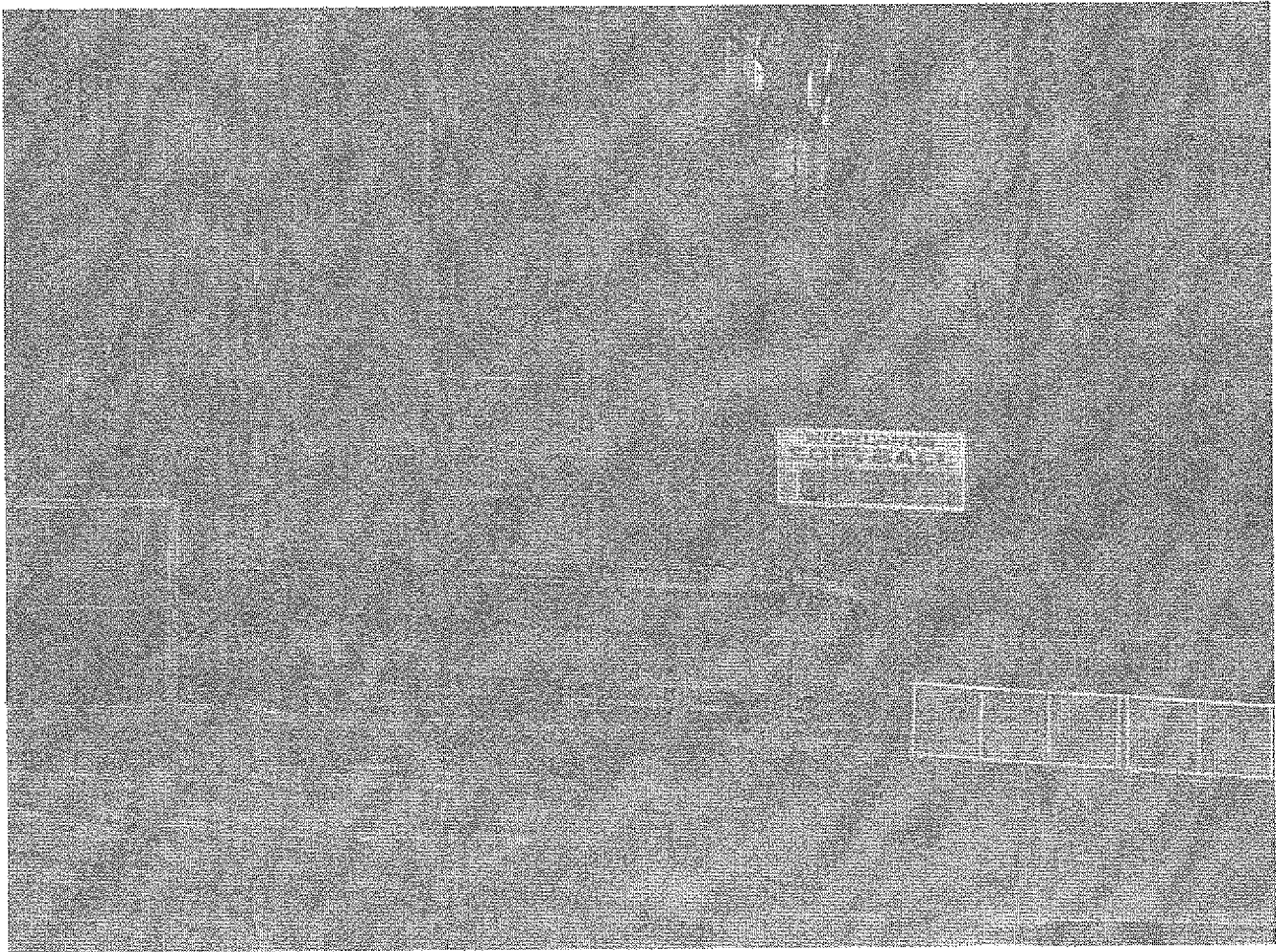
Thanks again for all of your assistance in helping us improve our athletic programs and the positive impact that it has had on our students.

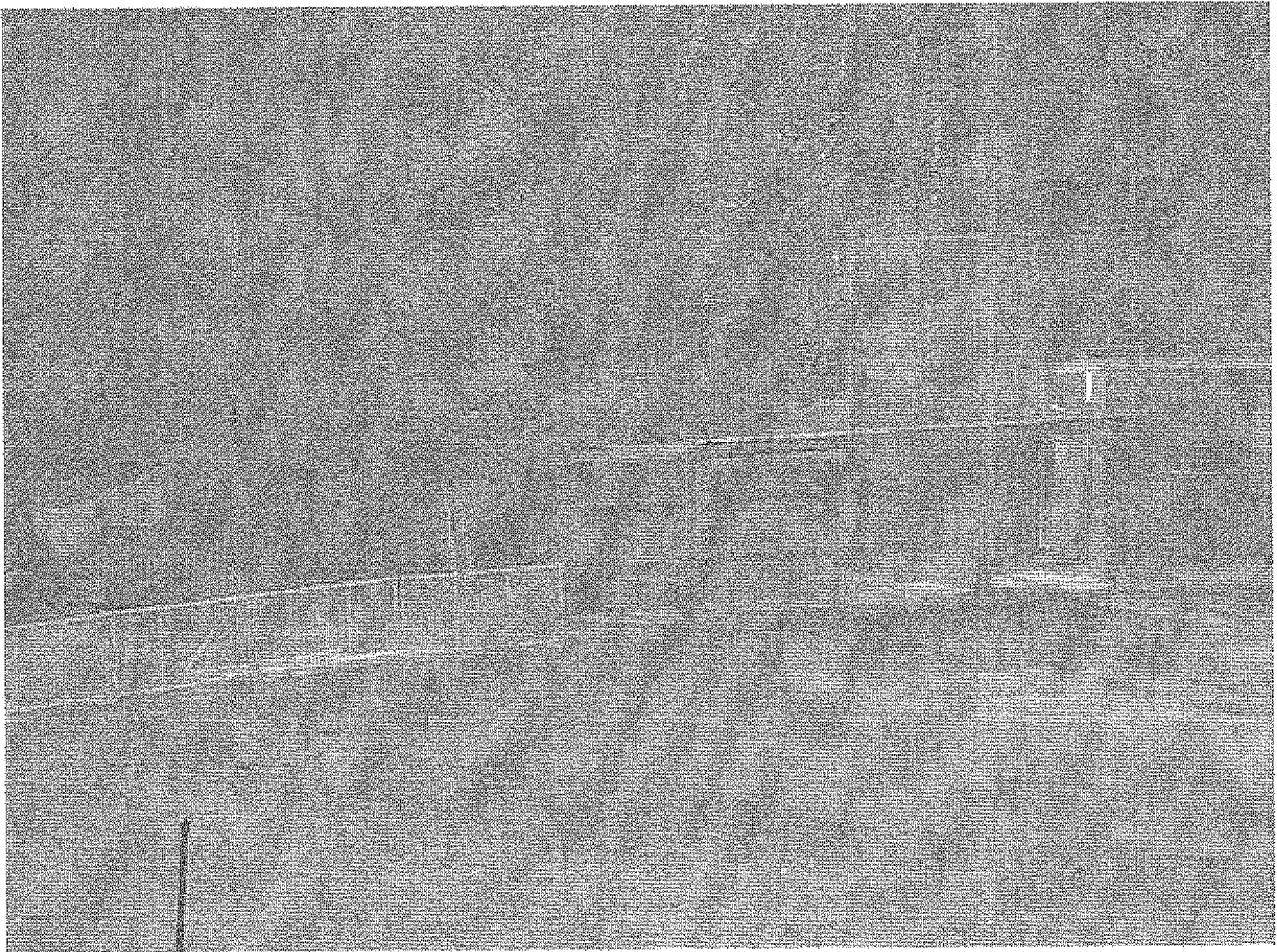
Sincerely

*Dale Mueller*  
Dale Mueller











**HIGHLANDS HIGH SCHOOL  
ATHLETIC DEPARTMENT**

**ATHLETIC DIRECTOR**

**DALE MUELLER**

**PHONE: 859-781-5900 X 11172**

**ATHLETIC OFFICE  
859-781-5900 X 11126**

**FAX  
859-442-4212**

**TO:** Gary Lawson **PHONE:** 859-293-5999

**FROM:** Dale Mueller

*The forms you requested follow.*





**KHSAA TITLE IX RE-VISIT  
VERIFICATION OF FORMS  
2006-2007 SCHOOL YEAR**

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The Highlands Ft. Thomas, Kentucky  
High School City

certifies to the KHSAA that the following is an accurate and true representation of the facts surrounding compliance with 20 V.S.C. Sections 1681-1688, It. Seq. (also known as Title IX).

The following persons are to be identified:

**School District Title IX Coordinator:**

Name	Rita Byrd
Professional Title	Assistant Superintendent
Phone Number	(859) 781-3333
Address	28 N. Ft. Thomas Ave. Ft. Thomas, KY 41075

**School Title IX Coordinator:**

Name	Dale Mueller
Professional Title	Athletic Director
Phone Number	(859) 781-5900
Address	2400 Memorial Pkwy. Ft. Thomas, KY 41075

The following *signatures* verify the authenticity of the documents included:

	SIGNATURE	DATE
Principal	<i>Elgin Emmann</i>	1/16/07
School Title IX Coordinator	<i>Dale Mueller</i>	1/16/07
Superintendent	<i>Garry D. Stinson</i>	1/18/07
District Title IX Coordinator	<i>Rita Byrd</i>	1/16/07
School Board Chairperson	<i>Karen B. Allen</i>	1-18-07



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VERIFICATION OF FORMS  
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School Name: Highlands H.S.

**Gender Equity Review Committee Members:**

MEMBER NAME	TITLE	SIGNATURE	DATE	(✓)
Willie Schlarme	MATH TEACHER Boys BASKETBALL COACH	Willie Schlarme	1/16/07	
Brad Fennell	School Board	Brad Fennell	1/16/07	
Elgin Emmons	Principal	Elgin Emmons	1/16/07	
Jaime Richey	Girls Basketball Coach	Jaime W. Richey	1/16/07	
Brenda Staggs	Counselor	Brenda W. Staggs	1/16/07	
Rita Byrd	ASSISTANT SUPERINTENDENT Title IX Coordinator	Rita Byrd	1/16/07	
Sally Walters	ENGLISH TEACHER VARSITY CHEER COACH	Sally Walters	1/16/07	
Kevin A. Nieporte	Science Teacher MS. Boys BASKETBALL VARSITY SOFTBALL COACH	Kevin A. Nieporte	1/16/07	
Beth Hudepohl	Parent Rep	Beth Hudepohl	1/16/07	
Dale Mueller	Athletic Director	Dale Mueller	1/16/07	

- Please check (✓) if Committee member has reviewed this final submission.



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VERIFICATION OF FORMS  
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School Name: Highlands H.S.

**Gender Equity Review Committee Members:**

MEMBER NAME	TITLE	SIGNATURE	DATE	(✓)*
Scott Easton	Parent Rep	Scott W. Easton	1/16/07	
Kelli Stuntebeck	student rep.	Kelli Stuntebeck	1-17-07	
Michael Eaton	Student rep	Michael Eaton	1-17-07	

\* - Please check (✓) if Committee member has reviewed this final submission.