



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

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

School: Highlands  
 Prepared By: Gary W. Lawson  
 Date of Re-Visit: January 20, 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)

X	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: The rosters and data submitted by the school indicates that the standard established in Test 1 for provision of athletic opportunities has been met during two of the past three school years (2011-12 and 2013-14). Based on this evidence, it does appear that this standard is currently being met. The 2013-14 annual report shows that females made up 47% of the school's enrollment, and they were 44% of the 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 rosters and information submitted, the school has not met the standard established in Test 2 for provision of athletic opportunities during any of the past three years. The T-2 form in the 2013-14 annual Title IX report shows that one varsity team, (bowling), with approximately ten current participants, has been added for females 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 information submitted on the T-3 forms in the annual Title IX reports, it does appear that the school is meeting the standard established in Test 3 for the provision of athletic opportunities. The responses on the T-3 form do appear to be supported by the information found in the most recent student athletic interest survey.

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>The January 22, 1002 Title IX school visit report rated this area <i>Satisfactory</i> stating that the evidence indicated that the school was meeting the standard established in Test 1 for provision of athletic opportunities. The January 24, 2007 report documented that the accommodation of student interests was <i>Satisfactory</i> based on the school meeting the standards established in both Tests 1 and 3 for the provision of athletic opportunities. The reports submitted for the past three years give strong indication that the standards established in both Tests 1 and 3 are currently being met. The school offers 25 team participation opportunities for both male and female students at this time. (See detailed explanation for each of the three opportunities tests on page 2 of this report.) During the most recent visit, the school's Title IX file was examined and found to contain the two previous Title IX school visit reports, annual reports for the past five years, an 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, facilities usage schedules for the gym, fitness center, and the soccer field, written guidelines regarding the provision of letters and bars (see <i>Publicity</i> and <i>KHSAA Recommended Action</i>), written designation of the locker room and athletic equipment storage space assigned each team, written agendas for all Gender Equity Review Committee meetings held during the past three years. School officials were reminded that minutes are to be kept for all meetings. (See <i>KHSAA Recommended Action</i>.) Also contained in the Title IX file was a uniform review, rotation, and/or replacement plan, guidelines for the provision of meals for student athletes (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 administrators were commended for the development and maintenance of a well organized Title IX file.</p>

Equipment and Supplies	X		The 2002 and 2007 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . Both reports documented that the school had an equitable uniform review, rotation, and/or replacement plan in place at the time of the visits. The school currently has a uniform review plan based on a four-year cycle of rotation except for boys and girls tennis and girls and boys golf. These teams replace uniforms and T-shirts annually. One half of these teams' individual uniforms is paid for by the student, and the other half of the cost is covered by the school. All the uniforms reviewed during the most recent visit were of mid-to-high quality and seemed to be supplied in equitable quantities. According to the information in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$88 per female athlete and \$147 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both previous Title IX school visit reports designated this benefit category <i>Satisfactory</i> . Information provided during the most recent visit revealed that the number of competitive events scheduled for teams of "like" sports was comparable. Facility usage schedules showing parity were provided for all shared athletic venues (gym, soccer field, and fitness center). School officials were commended for scheduling competitive events for both genders during optimal playing times.
Travel and Per Diem Allowances	X		The 2001 and 2007 Title IX school visit reports both rated this benefit category <i>Satisfactory</i> . The 2007 report noted that the school had some written guidelines that called for equitable provision in this area. The regulations reviewed during the most recent visit addressed the provision of meals but did not address the mode of transportation or the provision of lodging for student athletes. (See <i>KHSAA Recommended Action</i> .) According to the data in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$82 per female athlete and \$92 per male athlete for travel and per diem.

Coaching	X		<p>Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The school's athletic director is responsible for evaluation of all head coaches. A written instrument is not used as a part of this process at this time. According to information on the T-35 form in the 2013-14 annual Title IX report, the total amounts spent for coaching salaries for teams of "like" sports were comparable. A review of the district's extra service pay schedule for coaches showed relative parity. The data submitted in the <i>Coaching</i> column on the most recent T-35 form shows that the coaching ratio is one coach per 14 participants for both male and female athletes. Information gathered during the most recent visit revealed that 30% (3/10) of the head coaches of girls teams and 50% (5/10) of the head coaches of boys teams were on-campus employees.</p>
Locker Rooms, Practice and Competitive Facilities	X		<p>The 2002 Title IX school visit report rendered this benefit category <i>Deficient</i> stating the major issue was the lack of provision of equitable amenities at the softball facility. The 2007 report deemed this category <i>Satisfactory</i> documenting that a new backstop, access road, and portable fence had been added at the softball field. It was also noted that the football team was no longer using the softball team's outfield for practice. The school also had a plan at to add dugouts at the softball field by the beginning of the 2007 season. The most recent visit revealed that a new softball field is being used that is located at Wenkler Field about a mile from the school campus. This field is very well manicured and maintained. A project is currently in progress at that field to construct a press box, concession stand, and public restrooms. The field has fence, electric scoreboard, large block dugouts, and a field tarp. When this project is completed, it appears that the amenities provided at the softball field will be slightly superior to those at the baseball field located at Highland Park which is also about one mile from the school campus. The school has also constructed a new state-of-the-art soccer field and track complex at Tower Park about two and a half miles from the campus. These newly</p>

Locker Rooms, Practice and Competitive Facilities continued			developed venues have greatly enhanced the benefits provided for all student athletes. The other indoor and outdoor competitive facilities appear to provide equitable benefits. New locker rooms have been built adjacent to the fitness center. These rooms offer excellent amenities and seem to be assigned equitably. All other locker room areas provide equitable amenities for both genders. Equipment storage space is assigned to all teams in an equitable manner.
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<p>Medical and Training Facilities and Services</p>	<p>X</p>		<p>Both the previous Title IX school visit reports designated this benefit category <i>Satisfactory</i>. The 2002 report requested that an equitable usage schedule be developed and implemented for the weight training room. The 2007 report documented that the school had developed an equitable schedule for the facility, but it was not posted at that venue. The most recent visit showed that the school has constructed a large, very well equipped fitness center that serves all school sponsored teams except football. The center provides numerous equipment options that are suitable for use by female athletes. Interviews with student athletes, coaches, and administrators indicate there is widespread use of this facility by female athletes. There was an equitable usage schedule for this venue in the school's Title IX file. This schedule was posted at the facility on the day of the visit. A second weight room with less equipment options is provided for the exclusive use of the football team. An athletic trainer is available on a daily basis for all athletes through a contract with St. Elizabeth's hospital. Student athletes are responsible for getting their own physical examinations.</p>
<p>Publicity</p>	<p>X</p>		<p>The 2002 and 2007 reports rated this benefit category <i>Satisfactory</i>. The original report noted disparities in relation to support by the cheerleaders, and the school was requested to develop equitable written guidelines for the posting of athletic recognition. The school currently has one cheerleading squad that cheers at all home, away, and post season football games. During the winter sports season, they cheer at all home and postseason games for boys and girls basketball. The full band performs at all home football games. The pep band performs at an equal number of home boys and girls basketball games as monitored by the school's athletic director. The dance team performs at an equal number of boys and girls basketball games and an equal number of boys and girls soccer games as overseen by the athletic director. The school's Title IX file contained detailed written guidelines for the provision of letters and bars.</p>

Publicity continued		<p>These guidelines did not address the posting of athletic recognition, and the provision of awards or post season banquets. (See <i>KHSAA Recommended Action</i>.) According to the information in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$10 per female athlete and \$18 per male athletes for awards. These figures imply there is a male advantage in this facet of the benefit category.</p>
Support Services	X	<p>The 2002 Title IX school visit report rated this benefit category <i>Satisfactory</i> even though the T-35 and T-36 forms were incomplete. The 2007 report deemed this category <i>Deficient</i> citing athletic expenditures favored the male athletes during the previous three years. According to information supplied by administrators, the school currently has one active booster club which provides support for all school sponsored teams. This club houses all its funds off the school campus. School administrators reported that the athletic director is responsible for requesting all funding and approving all purchases made by the booster club. However, this very important regulation was not documented with written evidence during the most recent school visit. (See <i>KHSAA Recommended Action</i>.) An analysis of spending for the past two years shows that 45% of spending for 2012-13 was for female athletes who made up 44% of the participants, and 55% of the spending was for male athletes who made up 56% of the participants. This means approximately \$923 was spent per female athlete and \$864 per male athlete. In school year 2013-14, 34% of the spending was for female athletes who made up 44% of the participants and 66% was for male athletes who made up 56% of the participants. This translates into \$390 being spent per female athlete and \$600 per male athlete during that year. Spending appeared to strongly favor female athletes in 2012-13 and strongly favor male athletes in 2013-14. Over the two-year period, the spending is approximately \$656 per female athlete and \$732 per male athlete which is within generally accepted parameters for the provision of parity for a football playing</p>



			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:

- construction of a new softball field to be completed by March 1, 2014;
- installation of a new floor in the gym;
- construction of a new health and wellness center;
- promotion of attendance at all girls competitive events.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the January 20, 2015 Title IX school visit. There were "areas of concern" in relation to developing written guidelines for the provision of awards and post season banquets and the posting of athletic recognition (see *Publicity* and *KHSAA Recommended Action*), the provision of equitable written regulations for travel and per diem (see *Travel and Per Diem Allowances* and *KHSAA Recommended Action*), keeping written minutes for all Gender Equity Review Committee meetings (see *Accommodation of Interests and Abilities* and *KHSAA Recommended Action*), and producing written evidence of the procedure for oversight of booster expenditures to monitor the provision of equitable benefits (see *Support Services* and *KHSAA Recommended Action*).

7. KHSAA Recommended Action in relation to new deficiencies

Although no deficiencies were designated in the body of this report, it is requested that the following "areas of concern" be addressed in an attempt to insure that equitable opportunities and benefits continue to be provided.

(Accommodation of Interests and Abilities) On or before April 28, 2015, the school is to submit to KHSAA written minutes for at least one Gender Equity Review Committee meeting held after January 21, 2015.

(Publicity) On or before April 28, 2015, the school is to submit to KHSAA a written expansion of the guidelines for this benefit category that includes steps taken to insure equitable provision of athletic awards, post season athletic banquets, and the posting of athletic recognition (banners/jerseys) in the gymnasium. This expansion should be a part of the school's Title IX improvement plan (T-60 form) in the annual (April 30, 2015) Title IX report and also become a permanent part of the school's Title IX file.

(Travel and Per Diem Allowances) On or before April 28, 2015, the school is to submit to KHSAA a written expansion of the current travel and per diem regulations to include equitable provision regarding mode of transportation and lodging for student athletes. This expansion should also be a part of the School Improvement Plan (T-60 form) submitted in the annual Title IX report, and this document should become a permanent part of the school's Title IX file.

(Support Services) On or before April 28, 2015, the school is to submit to KHSAA a written designation of the process for the administrative oversight of booster club expenditures for the provision of parity in relation to athletic benefits. This document should also become a part of the school's Title IX file.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency in the benefit category of *Support Services* appears to have been addressed by the steps taken to provide oversight of spending described in the April 14, 2007 letter to KHSAA. (See KHSAA Title IX file.) Although athletic spending has not shown a consistent pattern over the past five years, the disparity between the two genders has decreased. An analysis of spending for the past two years shown in this report indicates that these expenditures are within generally accepted parameters for the provision of parity. This report does include a request for a written description of the procedure in place for oversight of booster spending. (See *KHSAA Recommended Action in relation to new deficiencies.*)

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Dale Mueller, 2400 Memorial Pkwy., Ft. Thomas, KY 41075  
(859) 815-2607

District Level Title IX Coordinator: Jon Stratton, 28 N. Ft. Thomas Ave., Fort Thomas, KY 41075  
(859) 781-3333

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Lydia Graves	Student Athlete	(859) 815-2607
Carson Haas	Student Athlete	(859) 815-2607
Jaime Richey	Coach	(859) 815-2652
Kris Laskey	Coach	(859) 781-5900
Brian Robinson	Principal	(859) 815-2600
Dale Mueller	Athletic Director	(859) 815-2607
Jon Stratton	Asst. Superintendent	(859) 815-2011
Karen Allen	School Board Member	(859) 801-8934
Amy Leigh	Parent	(859) 781-2626
Barbara Kok	KHSAA	(859) 299-5472

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:20 pm EST.