



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

(For schools re-visited during the 2016-2017 school year)

School: Jackson City
 Prepared By: Gary W. Lawson
 Date of Re-Visit: November 17, 2016
 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
- Corrective Action 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
X	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 rosters and data submitted, the school has met the standard established by Test 1 for provision of athletic opportunities during each of the past two school years. In 2014-15, females were 54.9% of the school's athletic participants and they made up 59.8% of the enrollment. In 2015-16, the internal audit summary documents that subtest 3 under Test 1 was met.

- 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 internal audit summaries for the 2014-15 and 2015-16 annual Title IX reports show that the standard established by Test 2 for the provision of athletic opportunities has been met during each of the past two school years. The T-2 form in the 2015-16 annual report shows that three teams for female participation have been added during the past five years. Currently, these teams have 36 participants which increases the total percentage of participation for females to 31.5%.

- 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: Information and responses on the T-3 form and the T-60 form gives strong indication that the standard established by Test 3 for provision of athletic opportunities is being met. Evidence from the T-3 form suggest that the school is addressing all indicated student interests for validity.

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 in the 2015-16 annual Title IX report shows that a 95.8% completion rate was received on the most recent student athletic interest survey.

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

Benefit to Students	Satisfactory	Deficient	Comments
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Accommodation of Interests and Abilities	X		<p>The December 18, 2011 and January 25, 2011 Title IX school visit reports deemed this category <i>Satisfactory</i>. The 2001 report stated that it appeared the standards established for Tests 1 and 3 were being met. The 2011 report documented that it appeared the standard established by Test 3 was being met at that time. A review of more recent reports gives indication that the standards established by all three tests for provision of athletic opportunities are being met currently. In regard to Test 1 in 2014-15, the school met the standards of both subtests 1 and 3. In 2015-16, subtest 1 was met. In regard to Test 2, it appears that the percentage of female participation was increased by 31.5% by adding teams during the past five years. Information and responses submitted in the annual reports show that appropriate steps are being taken to address student athletic interests. Therefore, compliance with the standard established by Test 3 is likely. (See detailed explanation for all three opportunities tests on page 2 of this report.) The school's Title IX file was reviewed during the most recent visit. It was found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five 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, facility usage schedules for the gym and weight training room, a written booster club agreement (see <i>Support Services</i>), guidelines regarding the posting of banners and the provision of awards (see <i>Publicity and KHSAA Recommended Action</i>), written designation of locker room and athletic equipment storage space assigned each team, a school-generated athletic handbook for students, minutes for all Gender Equity Review Committee meetings held during the past three years, a written plan for the equitable review and replacement of uniforms (see <i>Equipment and Supplies</i>), regulations regarding the provision of meals for student athletes (see <i>Travel and Per Diem Allowances</i>), and a copy</p>
Accommodation of Interests and Abilities			

continued			of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). <u>School officials were highly commended for providing evidence that the school is meeting the standards established by all three athletic opportunities tests and for the development and maintenance of a comprehensive and well-organized Title IX file.</u>
Equipment and Supplies	X		Both the previous school visit reports rendered this benefit category <i>Satisfactory</i> . The 2001 report requested that the school develop an equitable plan for review/replacement of uniforms. The 2011 report documented that a uniform review plan was in place which was based on a four-year replacement cycle. Information gathered during the most recent visit revealed that the school still has a uniform review/rotation plan based on a four-year cycle. UPON RECEIPT OF THIS REPORT, THE GOLF TEAM, WHICH HAS THEIR UNIFORMS (shirts) REPLACED ANNUALLY, IS TO BE ADDED TO THE CURRENT PLAN. All uniforms and equipment viewed during the visit were of mid-to-high quality and appeared to be supplied in equitable quantities. According to information in the 2014-15 and 2015-16 annual Title IX reports, the school was spending approximately \$63 per female athlete and \$86 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . Information gained during the most recent visit showed that the number of competitive events scheduled for teams of "like" sports was comparable. Equitable usage schedules were available for the gym and weight training room—the two shared facilities. The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the provision of parity in this regard.
Travel and Per Diem Allowances	X		The 2001 and 2011 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . Written

			<p>regulations addressing the equitable provision of meals for student athletes were in the Title IX file. These regulations did not stipulate guidelines for equivalence in relation to mode of transportation (i.e. bus van, charter bus) or lodging. (See <i>KHSAA Recommended Action</i>.) Information in the 2014-15 and 2015-16 annual Title IX reports reveal that the school was spending approximately \$160 per female athlete and \$109 per male athlete for travel and per diem.</p>
Coaching	X		<p>The two earlier school visit reports deemed this benefit category <i>Satisfactory</i>. The school's principal is responsible for the evaluation of all head coaches. A written instrument is not being used as part of this endeavor. A review of the district's extra service pay schedule for coaches indicated parity in regard to the amounts of compensation for "like" positions and number of paid coaches for "like" sports. The T-35 form in the 2015-16 annual Title IX report shows that the total amounts spent for coaching salaries for teams of "like" sports was comparable. Data submitted in the most recent annual Title IX report shows that the coaching ratio is 18.5 per coach for female athletes and 9.2 per coach for male athletes. This ratio strongly favors male athletes. The primary reason for this disparity seems to be that fact that the T-35 form shows the school having a volleyball program at three levels (varsity, junior varsity, freshmen). This program has 36 total participants and only one coach listed for all three levels. THE SCHOOL ADMINISTRATORS AND GENDER EQUITY REVIEW COMMITTEE WERE REQUESTED TO INVESTIGATE THIS SITUATION AND TAKE THE NECESSARY STEPS TO NARROW THE DISPARITY IN RELATION TO COACHING RATIOS. Information gathered during this visit revealed that 50% (2/4) of the head coaches of girls teams and 40% (2/5) of the head coaches of boys teams are on-campus employees.</p>
Locker Room,	X		The two earlier school visit reports designated

Practice and Competitive Facilities			<p>this benefit category <i>Satisfactory</i>. At the time of both visits, it appeared that the amenities at the softball field were superior to those at the baseball field. The tour of facilities during the most recent visit showed that the girls softball field—located at Kiwanis Park about three miles from the school—provides high quality amenities. The location of the baseball field has changed since the 2011 visit. It is now at Douthitt Park which is also about three miles from the school. This facility offers comparable amenities to those at the softball field. All other outdoor and indoor practice and competitive venues appeared to offer equitable amenities. The school has two small but well-appointed dressing rooms that are very similar. One dressing room is assigned for all male athletic teams, and the other is used by all female teams. The school has two small athletic equipment storage rooms. All female teams use one of the rooms. The other room is assigned for all male teams, except soccer, which has a storage area adjacent to their playing field located at Douthitt Park. There is a <u>real need</u> at the school for more dressing room and athletic equipment storage space, but the available areas appear to be assigned equitably. There are no offices for any coaches at the school.</p>
Medical and Training Facilities and Services	X		<p>The 2001 and 2011 school visit reports rendered this benefit category <i>Satisfactory</i>. The 2011 report made two requests—the school was to develop and post an equitable usage schedule at the weight training room and look into purchasing more equipment for the weight room that was suitable for use by female athletes. The most recent tour of facilities revealed that the school has a small and moderately equipped weight training room adjacent to the cafeteria. There were several training options available in the facility that were suitable for females. A usage schedule for the weight training room showed equitable female access and was in the Title IX file and posted at the venue. There is no athletic trainer services provided for any athletic programs and 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 sponsors one cheerleading squad. This squad cheers at all home games and at away games versus district opponents for both the girls and boys basketball teams. The school does not have a band or dance team at this time. A local radio station broadcasts an equal number of boys and girls basketball games each year. The Title IX file contained a detailed policy calling for parity in regard to the posting of banners for athletic recognition for both team and individual athletic accomplishments. These regulations also addressed equitable provision of awards but did not contain stipulations regarding post season banquets. (See <i>KHSAA Recommended Action</i>.) The T-35 form in the 2015-16 annual Title IX report shows that <u>very few</u> male teams have expenditures for awards. The document also indicates that the school was spending approximately \$35 per female athlete and \$4.50 per male athlete for awards. <u>This spending should be closely monitored for equitable benefits within this category.</u></p>
Support Services	X		<p>.The 2001 and 2011 Title IX school visit reports designated this benefit category <i>Satisfactory</i>. The 2011 report documented the apparent need to monitor booster expenditures. Information gathered during the most recent visit revealed that the school currently has one booster club that supports boys basketball. This club houses all funds off the school campus. There is a written agreement between the school and the boys basketball boosters, but ,according to the agreement and interviews with administrators, there is no process in place at this time for administrative approval of booster purchases. IT WAS RECOMMENDED TO SCHOOL OFFICIALS THAT A MECHANISM BE PUT INTO PLACE FOR OVERSIGHT OF BOOSTER EXPENDITURES IN REGARD TO EQUITABLE PROVISION OF BENEFITS. The internal audit summary for the 2014-15 annual Title IX report shows that the school was spending approximately \$343 per female</p>

Support Services continued			athlete and \$419 per male athlete for total athletic support. The 2015-16 internal audit summary shows that the school was spending approximately \$303 per female athlete and \$302 per male athlete. The spending in 2014-15 slightly favored the male athletes and in 2015-16 it was well within generally accepted parameters for the provision of parity for a non-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 Corrective Action Plan (Form T-60)

The school's most recent T-60 forms call for **attempting to provide parity in regard to travel opportunities offered to student athletes.**

IT SHOULD BE NOTED THAT THE ONLY ITEM ON THE T-60 FORM FOR THE PAST TWO YEARS HAS BEEN RELATED TO EQUITABLE PROVISION OF TRAVEL OPPORTUNITIES.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the November 17, 2016 Title IX school visit.

The body of the report does document a few “areas of concern” in relation to:

- provision of an equitable uniform review plan which addresses the needs of all teams (see *Equipment and Supplies*);
- lack of equitable written guidelines addressing the provision of travel and per diem (see KHSAA Recommended Action);
- lack of complete equitable written guidelines regarding the provision of post season banquets (see KHSAA Recommended Action);
- apparent lack of administrative oversight of booster spending (see Support Services);
- evidence of advantage to male athletes in regard to the coaching ratio (see Coaching).

IT SHOULD BE NOTED THAT JACKSON CITY HIGH SCHOOL HAS HAD THREE TITLE IX SCHOOL VISITS—2001, 2011, AND 2016 AND HAS NOT BEEN REPORTED TO BE DEFICIENT IN ANY AREA. THE SCHOOL IS COMMENDED FOR CONTINUED PROGRESS IN RELATION TO EQUITABLE PROVISION OF OPPORTUNITIES AND BENEFITS FOR THEIR STUDENT ATHLETES.

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 continue to provide equitable benefits.

(Travel and Per Diem) On or before February 21, 2017, the school is to submit to KHSAA an expansion of the current guidelines for travel and per diem which addresses equitable provision in regard to mode of transportation and lodging for student athletes. This expansion should become a part of the Title IX file.

(Publicity) On or before February 21, 2017, the school is to submit to KHSAA an expansion of the current regulations for publicity which addresses equitable provision in relation to post season banquets. This expansion should become a part of the Title IX file.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the January 25, 2011 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Walter Thompson, Jr., 940 Highland Ave., Jackson, KY 41339
(606) 666-5164

District Level Title IX Coordinator: Walter Thompson, Jr., 940 Highland Ave., Jackson, KY 41339
(606) 666-5164

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Haley Turner	Student Athlete	(606) 666-5164
Camron Turner	Student Athlete	(606) 666-5164
Sarah Trent	Softball Coach	(606) 666-5164
John Couch	B and G Track & Field Coach	(606) 666-5164
Walker Thompson	Athletic Director	(606) 666-5164
Jerry Allen	Principal	(606) 666-5164
Misty Noble	Teacher, Parent, Coach	(606) 666-5164
Corey Hoskins	Boys Head Coach/Teacher	(606) 670-0179

10. Comments

jNo one from the community attended the Public Comments session. The school's athletic director was commended for his thorough preparation for the school visit. The meeting was adjourned at 3:20 pm EDT.