



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

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

School: Ludlow
Prepared By: Gary W. Lawson
Date of Re-Visit: September 22, 2014
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
	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 in the annual Title IX reports, the school has met the standard established in Test 1 for the provision of athletic opportunities for female athletes for the past three years. The T-1 form in the 2013-14 annual report shows that female students make up 45.3% of the school enrollment, and they are 52.3% 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: The information submitted on the T-2 forms in the annual Title IX reports show that the standard established in Test 2 for provision of athletic opportunities has not been met during any of the past three school years. The T-2 form in the 2013-14 report shows that no athletic teams at any level for either gender have been added 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: The responses and information submitted on the T-3 form in the annual Title IX report indicates that the school is likely meeting the standard established in Test 3 for provision of athletic opportunities for female athletes. The responses on the T-3 form 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

Comments: According to the information on the T-63 form in the 2013-14 annual Title IX report, an 81% 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
Accommodation of Interests and Abilities	X		<p>Both the previous school visit reports from January 10, 2002 and January 25, 2007 rated the opportunities component of Title IX <i>Satisfactory</i>. At the time of both of those visits, the school met the standard established in prong 1 of the opportunities test. The three most recent annual Title IX reports give clear indication that the standard of both prong 1 and prong 3 of the opportunities test are being met. (See detailed explanation on page 2 of this report.) The school's Title IX file was reviewed and found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five years, a board-approved document showing salary allotments for each sport (refer to <i>Coaching</i> and <i>KHSAA Recommended Action</i>), a listing of the current members of the Gender Equity Review Committee, game schedules for all current school-sponsored sports, facilities usage schedules for the gym and weight training room (see <i>Scheduling of Games and Practice Times</i>), guidelines regarding awards and recognition of athletic accomplishments (see <i>Publicity</i>), written designation of the locker room and athletic equipment storage space assigned each team, agendas for Gender Equity Review Committee meetings for 2012-13 and 2013-14 (see <i>Observed Deficiencies in Overall Boys and Girls Athletics Program</i>), minutes for the first meeting of the GERC in 2014-15, a uniform review, rotation, and/or replacement plan, guidelines relating to provision of travel and per diem (see <i>Travel and Per Diem</i>), a written booster club agreement, a school-generated athletic handbook, and a copy of the school's Athletic Facility Emergency Medical Plan (KRS160.445). School officials were commended for the development and maintenance of a comprehensive Title IX file.</p>

Equipment and Supplies	X		<p>Both the 2002 and the 2007 Title IX school visit reports assessed this benefit category as <i>Satisfactory</i>. At the time of both visits, an equitable uniform review/rotation plan was in place, and the equipment appeared to be of good quality and provided equitably. The most recent visit showed that the school has a uniform rotation plan in place based on a five-year cycle for all teams. Interviews with coaches and student athletes confirmed adherence to this plan. All the uniforms reviewed during the most recent visit seemed to be of good quality and supplied equitably except for a difference in the current baseball and softball jerseys. The baseball team had two jerseys—both of which appeared to be of superior quality when compared to the one jersey provided for softball players. <u>THIS DIFFERENCE SHOULD BE ADDRESSED AT THE TIME OF THE NEXT SOFTBALL UNIFORM PURCHASE.</u> According to information submitted in the 2012-13 and the 2013-14 annual Title IX reports, the school was spending approximately \$148 per male athlete and \$38 per female athlete for equipment and supplies. (See <i>Support Services</i>.)</p>
Scheduling of Games and Practice Time	X		<p>Both the previous school visit reports rendered this benefit category <i>Satisfactory</i>. According to information gathered during the most recent visit, the number of competitive events scheduled for teams of “like” sports showed parity. Usage schedules provided as well as interviews with coaches and student athletes indicated that all shared athletic facilities were assigned equitably. One shared venue for which an equitable schedule was not provided was the outdoor hitting facility which is used by baseball and softball. (See <i>KHSAA Recommended Action</i>.) The scheduling of athletic events during optimal playing times was discussed with school officials who were commended for the provision of parity regarding this benefit.</p>

Travel and Per Diem Allowances	X		<p>The reports from the two earlier school visits indicated this category was <i>Satisfactory</i>. The recent review of the Title IX file revealed that the school had written guidelines addressing the mode of transportation used for student athletes. The primary type of transportation is a school bus but a charter bus may be requested if specific mileage parameters are involved. The guidelines also address the equitable provision of meals for student athletes. <u>UPON RECEIPT OF THIS REPORT, THESE GUIDELINES ARE TO BE EXPANDED TO ADDRESS THE PROVISION OF EQUITABLE LODGING FOR OVERNIGHT TRIPS.</u> According to data submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$95 per female athlete and \$80 per male athlete for travel and per diem.</p>
Coaching	X		<p>The two previous school visit reports deemed this benefit category <i>Satisfactory</i>. The school's athletic directors are responsible for evaluating all head coaches using a written instrument developed by the school district. The T-35 form in the 2013-14 annual report shows the total amount for coaches' salaries for teams of "like" sports was comparable. The school board currently adopts a document each year showing the total lump sum allotted to each sport for salaries. This document does not show the specific salaries for each coach which means a comparison of the salaries of each position at every level is not possible. (See <i>KHSAA Recommendation</i>.) Data provided in the 2013-14 annual Title IX report shows the total number of coaches of teams of "like" sports was comparable. Information gathered during the visit indicated that 17% of head coaches of girls teams and 20% of head coaches of boys teams are employed off the school campus.</p>
Locker Rooms, Practice and Competitive Facilities	X		<p>The 2002 and 2007 Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2007 report recommended the school work with city officials to provide upgrades at the baseball and softball fields. The male athletes</p>

<p>Locker Rooms, Practice and Competitive Facilities continued</p>		<p>appeared to have a slight advantage in the provision of locker room space. Information presented and the tour of facilities taken during the most recent school visit revealed that the disadvantage to females had been addressed by the construction of new dressing facilities at the fieldhouse. These very well appointed facilities provide dressing areas for three female teams and three male teams. No evidence was offered during the most recent visit that would indicate that city officials had been approached about the use of a portable fence at the softball field. (See <i>KHSAA Recommended Action</i>.) Both the softball and baseball fields located at the city park across the street from the high school need some upgrades. The baseball field has no lights and the softball field has no fence. Numerous other amenities need improvements at both fields, but, overall, the venues are relatively comparable. There is a general need for more equipment storage space, but the available space seems to be assigned equitably. All shared locker rooms appear to be assigned with an awareness of the need for equity.</p>
<p>Medical and Training Facilities and Services</p>	<p>X</p>	<p>The previous school visit reports designated this benefit category <i>Satisfactory</i>. The 2002 report requested that an equitable usage schedule for the weight training room be developed and posted at the facility. The 2007 report documented that the requested schedule was in place and posted. The school currently has one small, but well equipped, weight training room located in the building near the gym. There is equipment available at this facility that is appropriate for use by females including a verti-max exerciser, two universal machines, several small hand weights, and small weight belts. An equitable usage schedule for this weight room was in the Title IX file and also posted at the facility. An athletic trainer is provided equitably to all student athletes each day after 3 pm through a contract with Nova Care. University of Cincinnati doctors provide free physical examination to any student athletes on a</p>

			designated day during the month of May.
Publicity	X		Both the previous Title IX school visit reports judged this benefit category <i>Satisfactory</i> . In 2002, written guidelines for the posting of banners was recommended. The 2007 report stated that guidelines for the posting of athletic banners were in the Title IX file. The school currently sponsors two cheerleading squads. One squad is exclusively for football while the other one cheers for boys and girls basketball. The football squad cheers at all home games and at away games versus district opponents. The basketball squad cheers at all home and all post-season games for both the boys and girls teams. The full school band performs at all home football games, and the pep band performs at four home girls basketball games and four home boys basketball games. The review of the Title IX file revealed written guidelines in this area that addressed the posting of athletic banners and the provision of trophies and awards. It is recommended that the guidelines be expanded to include the regulations for induction into the Athletic Hall of Fame and provision of post-season banquets. (See <i>KHSAA Recommended Action</i> .) According to data submitted in the 2012-13 and 2013-14 annual reports, approximately \$8 per female athlete and \$11 per male athlete was spent for awards.
Support Services	X		The 2002 and 2007 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The school currently has one booster club which supports all athletic teams. This club houses all its funds off the school campus. There is a signed agreement with this booster club, but there is no stipulation in this agreement that calls for school administrative oversight of booster spending for the provision of equitable benefits. An analysis of athletic spending over the past two years indicated that expenditures have favored male athletes. In 2012-13, the school spent approximately \$691 per male athlete and \$358 per female athlete. In 2013-14, spending was approximately \$597 per male athlete and \$409 per female athlete. It was

			recommended that school officials monitor this spending for provision of parity and put corrective action in place. (See <i>KHSAA Recommended Action.</i>)
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 Title IX improvement plans call for the following:

- upgrading of the surface on the track;
- upgrading of the locker rooms in the gym;
- construction of a batting cage to be shared by the softball and baseball teams.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No deficiencies were assigned as a result of the September 22, 2014 school visit. There are suggested steps to be taken in the areas of *Support Services, Coaching, Scheduling of Games and Practice Times, Publicity, Travel and Per Diem, and Locker Rooms, Practice and Competitive Facilities*. These suggestions and requests are listed in the body of this report, and some are also addressed in the section entitled *KHSAA Recommendations in relation to new deficiencies*. Although not listed under any benefit category, school officials are reminded that written minutes are to be kept for each Gender Equity Review Committee meeting and a sign in sheet should also be maintained to assure that a quorum of members are present.

7. KHSAA Recommended Action in relation to new deficiencies

Although no major deficiencies were designated by this report, the following "areas of concern" need to be addressed in an attempt to insure the equitable provision of benefits.

(Coaching) On or before December 15, 2015, the school is to submit to KHSAA a written listing of all coaching positions at all levels at the high school and the exact coaching salary allotted for each position.

(Scheduling of Games and Practice Times) On or before December 15, 2014, the school is to submit to KHSAA an equitable usage schedule for the outdoor hitting facility used by both baseball and softball. Documentation of the development of this schedule should also be a part of the April 30, 2015 Title IX Improvement Plan (T-60 form) submitted to KHSAA.

(Locker Rooms, Practice and Competitive Facilities) On or before December 15, 2014, the school is to submit to KHSAA written evidence that city officials have been contacted and the need for placement of temporary outfield fence at the softball field has been discussed. This document should include the anticipated outcome of this discussion. The document should be signed by one city official plus the school principal and athletic director.

(Publicity)

On or before December 15, 2014, the school is to submit to KHSAA equitable written guidelines for the provision of post season awards banquets. The guidelines should be added to the Publicity regulations already found in the school's Title IX file.

On or before December 15, 2014, the school is to submit to KHSAA the written regulations for induction into the Ludlow High School Athletic Hall of Fame. These regulations should also be added to the *Publicity* section in the school's Title IX file.

(Support Services) On or before December 15, 2014, the school is to submit to KHSAA
a description of the steps being taken by the school to monitor booster club spending for the provision of parity. This document should include any school personnel who are responsible for oversight of this spending. Documentation of this plan should also be a part of the school's April 30, 2015 Title IX Improvement Plan submitted to KHSAA.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated in the January 25, 2007 Title IX school visit report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Adam Clary, 713 Susan Ct., Burlington, KY (859) 261-8211

District Level Title IX Coordinator: Adam Clary, 713 Susan Ct., Burlington, KY (859) 261-8211

Name	Title	Telephone
Cameron Hart	Student Athlete	(859) 261-8211
Toriana Wofford	Student Athlete	(859) 261-8211
Jodi Schmidt	Volleyball Coach	(859) 261-8211
Vikki Wofford	Girls Basketball Coach	(859) 261-8210
Andrew Wise	Co-Athletic Director/CC Coach	(859) 261-8211
Mike Borders	Superintendent	(859) 261-8210
Travis Caudill	Principal	(859) 261-8211
Adam Clary	Co-Athletic Director	(859) 261-8211
Gary W. Lawson	KHSAA	(502) 545-3393

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:25 pm EDT.