



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

(For schools re-visited during the 2015-2016 school year)

School: Lynn Camp
 Prepared By: Gary W. Lawson
 Date of Re-Visit: October 19, 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: 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 three school years. The 2014-15 annual Title IX report shows that the percentage of participation for female athletes was 49.5% and the percentage of enrollment for females was 54.6%. (See *Internal Audit Summary* for the 2014-15 annual report—Row 14 and Row 20.)

- 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 rosters and information submitted in the annual Title IX reports indicate that the standard established by 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 2014-15 annual report shows that six teams for female participation have been added during the past five years. The addition of these teams has increased the percentage of participation for females by 22.4%.

- 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 data and responses on the T-3 forms submitted by the school give strong indication that the standard established by Test 3 is being met. The responses on the T-3 form appeared to be supported by the information found in the most recent student athletic interest survey. The school currently offers 12 total teams for female competition and the same number for male competition.

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

Comments: The T-63 form in the 2013-14 annual Title IX report shows that an 82% 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>The October 28, 2002 Title IX school visit report rated this area <i>Satisfactory</i> because it appeared that the school was meeting the standard established in all three Title IX opportunities tests. The February 18, 2009 report again rated the area <i>Satisfactory</i> citing evidence that the standard established by Test 3 was being met. The most recent annual Title IX reports give strong indication that the standard established by Test 3 continues to be met. It was recommended to school officials that if there is indicated interest in girls golf on this year's survey, follow-up steps taken to verify this interest should be part of the 2015-16 annual Title IX report. The Internal Audit Summary for the 2014-15 annual report states that the standard established by Test 1 is also being met. (See Line 20 of the <i>Internal Audit Summary</i> for 2014-15. A detailed explanation of each of the three opportunities tests is on page 2 of this report.) During the most recent school visit, the Title IX file was thoroughly examined and found to contain all the annual Title IX reports for the past five years, the reports for the two previous Title IX school visits, 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 varsity teams, written records of KHSAA visits regarding the construction of the softball field, written facilities usage schedules for the gym and weight training rooms, written statements regarding the purchase of athletic recognition banners (see <i>Publicity</i> and <i>KHSAA Recommended Action</i>), written designation of locker room and athletic equipment storage space assigned each team, minutes for all Gender Equity Review Committee meetings held in the past three years, a written uniform review, rotation, and/or replacement plan, some written guidelines regarding equitable provision of transportation for student athletes</p>

Accommodation of Interests and Abilities continued			(see <i>Travel and Per Diem Allowances</i> and <i>KHSAA Recommended Action</i>), and a copy of the Athletic Facilities Safety Procedures. This document is used to meet the requirements of KRS 160.445. School officials were commended for the vast improvement in their Title IX file.
Equipment and Supplies	X		Both the 2002 and 2009 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The 2002 report suggested that an equitable uniform review, rotation, and/or replacement plan be developed, and the 2009 report documented that the school still was <u>not following a written plan for the review and purchase of uniforms</u> . The most recent visit revealed that the school has a written uniform review plan based on a three-year cycle of rotation for all school sponsored varsity teams. Interviews during the visit gave some indication that the plan was being implemented. The uniforms and equipment reviewed during this visit were of medium to high quality and appeared to be supplied equitably in terms of quantity. According to the information submitted in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$88 per female athlete and \$118 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The 2009 report documented that there was a disparity in the number of varsity contests scheduled for softball compared to baseball. Information gathered during the most recent visit revealed that the number of competitive events scheduled for teams of “like” sports showed parity. Usage schedules provided for the shared practice facilities—gym and weight training room—indicated that these venues were assigned equitably. 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 relation to this benefit.

Travel and Per Diem Allowances	X		Both previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The 2002 report suggested that the school develop a written plan for the equitable provision of athletic per diem. The 2009 report stated that the school had developed some written guidelines for this category, but they had not reported their expenditures for travel and per diem on the T-35 and T-36 forms. Expenditures have been reported for this category for the past three years. These submittals appear to be complete and accurate. The written regulations found in the Title IX file pertaining to this benefit were extremely vague regarding mode of transportation and none were found regarding per diem (meals and lodging). (See KHSAA Recommended Action.) The data submitted in the 2013-14 and 2014-15 annual Title IX reports show that the school was spending approximately \$71 per female athlete and \$79 per male athlete for travel and per diem.
Coaching	X		The 2002 and 2009 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The principal and athletic director are responsible for the evaluation of all head coaches. A written instrument is not currently used as part of this process. A review of the district's extra service pay schedule for coaches indicated parity. According to the data found on the T-35 form in the 2014-15 annual Title IX report, the total amount spent for coaching salaries for teams of "like" sports is comparable. The 2014-15 annual report also shows that the coaching ratio for female athletes is 10.5 participants per coach, and the ratio for male athletes is 11 participants per coach. Information provided during the visit indicates that 75% (6/8) of the head coaches of girls' teams and 71% (5/7) of the head coaches of boys teams are employed on the high school campus.
Locker Room, Practice and Competitive Facilities	X		The 2002 report rated this benefit category <i>Satisfactory</i> but recommended the development of a plan for an on-campus softball field. The 2009 report rated the

<p>Locker Room, Practice and Competitive Facilities continued</p>		<p>category <i>Deficient</i> stating that no positive steps had been taken during the past six years to narrow the gap in amenities provided at the softball field when compared to other sports. The most recent visit showed that the new on-campus softball field is complete. An inspection on April 1, 2010 noted that the field was complete except for the installation of lights. (See Title IX letter from G. Lawson to D. Bilberry dated 4/1/10.) This venue is very impressive and offers amenities comparable to those at the baseball field. During this visit, the KHSAA representative was shown written plans for further construction at the softball field which included extra team storage space, public restrooms, and a small team dressing area. School officials were <u>strongly encouraged to complete this project and to document the progress</u> made on the school's Title IX Improvement Plan (T-60). Locker rooms appear to be equitable and the shared dressing areas seemed to be assigned with equivalence as a priority. All teams have an assigned equipment storage area. Although several of the areas are small, they appear to be equitable. School officials were commended for moving this benefit category from a deficient rating to a satisfactory one.</p>
<p>Medical and Training Facilities and Services</p>	<p>X</p>	<p>The 2002 Title IX school visit report rated this benefit category <i>Satisfactory</i> but stated that there was no posted usage schedule for the weight training room. The 2009 report again rated this area <i>Satisfactory</i> and documented that a new weight training room was being constructed, but there still was <u>no posted usage schedule</u> for the weight room being used at that time. The most recent visit revealed that the second weight training room had been completed. The school now has two weight facilities with equitable usage schedules posted at both. Weight training room #1 is located adjacent to the gym and contains numerous training options that are very suitable for female athletes. Weight training room #2 is a larger and more updated facility located in the football fieldhouse. Interviews during the visit confirmed use of this second weight room by female teams. It does</p>

			appear that the equipment in weight room #2 is more suitable for male athletes. The school does not currently provide any athletic training services. Physical examinations for student athletes are not provided by the school.
Publicity		X	The previous two Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The school sponsors one cheerleading squad that cheers at all home and away football games. They also cheer at all home boys and girls basketball games and at away games versus district opponents for both teams. The school does not have a band or dance team. The review of the school's Title IX file showed <u>no written regulations</u> regarding equitable provision of athletic recognition—posting of banners and pictures, provision of awards and postseason banquets. Adding to the challenge of evaluating this benefit category was the fact that the school failed to report expenditures on the T-35 form in the <i>Awards</i> column. The combination of a lack of written guidelines and reported expenditures make a complete evaluation of this benefit category impossible and renders it deficient. (See KHSAA Recommended Action in relation to new deficiencies.)
Support Services	X		The 2002 Title IX school visit report rated this benefit category <i>Deficient</i> stating that it appeared the expenditure information submitted by the school had been incomplete and incorrect. The 2009 report rated this category <i>Satisfactory</i> and documented improvement in reporting expenditures accurately and completely except in the area of Travel and Per Diem. The most recent visit revealed that the school currently has no athletic booster clubs. All funding for athletic programs is handled through school accounts using the purchase order process. It was recommended that school officials and the Gender Equity Review Committee review the Internal Audit Summary provided by KHSAA (lines 1-11). The internal analysis summary for the 2013-14 annual Title IX report shows that athletic spending significantly favored male athletes that year. Approximately \$404 was spent per female athlete and \$615 per male

			athlete. The Internal Audit Summary for 2014-15 showed that per athlete spending was within generally accepted parameters for parity for a football-playing school—approximately \$420 for females and \$513 for males.
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 development of a plan for oversight of athletic spending for the provision of parity.

It should be noted that the school has listed the same single item for improvement for the past three school years.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The one deficiency designated as a result of the October 19, 2015 Title IX school visit was in the benefit category of *Publicity*. The school's failure to develop adequate guidelines for the provision of equity and failure to disclose their expenditures for this benefit category resulted in the deficiency. (See *KHSAA Recommended Action*.)

There was also an "area of concern" listed in relation to the development of equitable written regulations for the mode of transportation and the provision of per diem for student athletes. (See *KHSAA Recommended Action*.)

7. KHSAA Recommended Action in relation to new deficiencies

(Publicity)

- On or before February 1, 2016, the school is to submit to KHSAA equitable written guidelines addressing the posting of banners and/or pictures for athletic recognition for both teams and individual athletic participants, equitable provision of athletic awards for individuals and teams, and equitable provision of post season banquets for school sponsored teams.
- The school's annual Title IX report submitted to KHSAA no later than April 30, 2016 is to contain complete and accurate expenditures in the **Awards** column on the **T-35** form.

Although not currently considered to be deficient, the following "area of concern" is to be addressed in an attempt to insure that equitable benefits are provided.

(Travel and Per Diem Allowances)

On or before February 1, 2016, the school is to submit to KHSAA written regulations for Travel and Per Diem which specifically address equitable provision in relation to mode of transportation and meals and lodging for student athletes.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

It appears that the deficiency assessed by the February 18, 2009 Title IX school visit in the area of Locker Rooms, Practice and Competitive Facilities has been addressed by the construction of a new on-campus softball facility that provides amenities that are comparable to other outdoor athletic venues at the school.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Danny Green, 100 N. Highway 830, Corbin, KY 40701
(606) 528-5429

District Level Title IX Coordinator: Kevin Parsons, 200 Daniel Boone Dr., Barbourville, KY 40906
(606) 546-3157

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Shelby Green	Student Athlete	(606) 528-5429
Austin Maier	Student Athlete	(606) 528-5429
Jodie Carnes	Girls Bowling Coach	(606) 528-5429
Richard B. Jones	Girls Basketball/Boys C C	(606) 528-5429
Anthony Pennington	Principal	(606) 528-5429
Daniel W. Green	Athletic Director	(606) 344-3394
Donna Green	Parent	(606) 528-5429
Melisa Bennett	Parent	(606) 528-5429
Dinky Phipps	Boys Basketball	(606) 528-5429
Earl Gregory	Archery/ Bowling/Softball	(606) 528-5429
Allen W. Harris	Football/Track Coach	(606) 528-5429
Mary Overbuy	Girls CC/Track Coach	(606) 528-5429

10. Comments

No one from the community attended the Public Comments session. The school's athletic director and principal were commended for their preparation for the school visit. The meeting was adjourned at 3: 20 pm EDT.