



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

**(For schools re-visited during the 2013-2014 school year)**

School: Ohio County  
Prepared By: Gary W. Lawson  
Date of Re-Visit: January 23, 1014  
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

Title IX Improvement Plan Summary Charts (Form T-60) 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
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 to KHSAA in the annual Title IX reports show that the standard established in Test 1 for provision of athletic opportunities has not been met during any of the past three school years. In 2012-13, the percentage of participation for females was 39% and the percentage of enrollment for females was 48%--a difference of nine percent. School officials were cautioned to make sure that all team rosters submitted to KHSAA are accurate.

- 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 data and rosters submitted to KHSAA indicate 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 2012-13 annual Title IX report shows that one team (swimming) for girls with approximately five current participants has 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 school does not appear to be meeting the standard established in Test 3 for provision of athletic opportunities at this time due to the failure to pursue the indicated interest in bowling (37 girls) for validity as requested on the T-65 form sent to the school on August 27, 2012. There is also an indicated interest in archery (51 girls) which also needs to be addressed.

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 February 26, 2002 school visit report rated this area <i>Deficient</i> stating that the school did not appear to be meeting the standard established in any of the three tests for provision of athletic opportunities. The February 15, 2006 report rated this area <i>Satisfactory</i> because information submitted indicated that the school was meeting the standards established in both Tests 2 and 3. The report verified that the school had added <u>seven</u> teams for female participation during the previous three years. The more recent annual reports submitted for the past three years show that the standard established in Test 1 has not been met during any of these school years. Rosters and data submitted show that the standard established in Test 2 has not been met. Because the indicated interests in bowling (37 girls) and archery (31 girls) have not been addressed for validity, it seems the standard for Test 3 has also not been met. Since the school is unable to provide documentation that the standard established in any one of these tests is being met, this area is judged to be <i>Deficient</i>. School officials were reminded that failure to provide equitable opportunities to participate has been designated as the most serious deficiency in relation to athletes under Title IX. (See <i>KHSAA Recommended Action</i>.) During the visit, the Title IX file was reviewed. It was found to contain the two previous Title IX school visit reports, all the annual reports to KHSAA 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 members, game schedules for all school sponsored sports except cross country (see <i>Scheduling of Games and Practice Times</i> and <i>KHSAA Recommended Action</i>), athletic programs for fall, winter, and spring sports, a school-generated athletic handbook for student athletes and parents, a booster club agreement, facilities usage schedules for all shared venues except the soccer fields (see <i>Scheduling of Games and Practice Times</i> and</p>

Accommodation of Interests and Abilities continued			KHSAA <i>Recommended Action</i> ), some guidelines regarding awards and recognition of athletic accomplishments (see <i>Publicity</i> and <i>KHSAA Recommended Action</i> ), written designation of locker room and athletic storage room space assigned each team, minutes for all Gender Equity Review Committee meetings held during the past five years, a written uniform review rotation and/or replacement plan, guidelines relating to the provision of meals and lodging for student athletes (see <i>Travel and Per Diem</i> ), and a copy of the athletic facility emergency medical plan (KRS 160.445). School officials were encouraged to continue to work toward the development of a comprehensive Title IX file.
Equipment and Supplies	X		The 2002 school visit report deemed this benefit category <i>Satisfactory</i> but did suggest the development and implementation of an equitable uniform review rotation and/or replacement plan. The 2006 report again rated this category <i>Satisfactory</i> while stipulating that there still was no uniform rotation plan in place. On August 1, 2006, the school submitted to KHSAA a written uniform rotation plan based on a four-year cycle of review. The most recent school visit revealed that the school had a uniform rotation plan in place which called for annual review for replacement in the sports of boys and girls golf, boys and girls track, boys and girls cross country, and wrestling. All other sports were under a three-year cycle of review for replacement. All the uniforms and equipment inspected during the latest visit appeared to be of mid-to-high quality and was equitably supplied in regard to quantity. According to data submitted in the 2011-12 and 2012-13 annual Title IX reports, the school was spending approximately \$174 per female athlete and \$224 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . Game schedules made available during the recent visit showed that the number of competitive events scheduled for teams of

Scheduling of Games and Practice Time continued		<p>"like" sports was comparable. No schedules were provided for boys or girls cross country. (See <i>KHSAA Recommended Action</i>). Equitable practice schedules were provided for the gym and the indoor batting facility. The only other shared practice facility was the soccer fields for which no schedules were provided. (See <i>KHSAA Recommended Action</i>.) The scheduling of athletic events during the optimal playing times was discussed with school officials who were commended for provision of parity regarding this benefit.</p>
Travel and Per Diem Allowances	X	<p>Both the previous school visit reports rated this benefit category <i>Satisfactory</i>. The Title IX file contained some equitable guidelines addressing the provision of meals and lodging for student athletes. UPON RECEIPT OF THIS REPORT, THESE GUIDELINES ARE TO BE EXPANDED TO INCLUDE THE MODE OF TRANSPORTATION. This expansion should address the reasons for using other district-owned vehicles, charter buses, etc. when school buses are not used. The information submitted in the 2011-12 and 2012-13 annual Title IX reports indicated that the school was spending approximately \$78 per female athlete and \$103 per male athletes for travel and per diem.</p>
Coaching	X	<p>Both the previous Title IX school visit reports designated this benefit category <i>Satisfactory</i>. The 2006 report stated that data submitted to KHSAA did not show the total expenditures for coaching salaries. Information provided during the most recent visit revealed that the principal is responsible for evaluating all head coaches and no written instrument is used as part of this process. According to data submitted in the annual Title IX reports, the total amounts spent for coaching salaries for teams of "like" sports was comparable. A review of the extra service pay schedule showed parity. It was impossible to evaluate the accessibility of coaching because <u>the number of coaches for some teams listed on the T-35 form was incorrect according to school officials.</u> It was also stated that some coaches, whose positions were not</p>

Coaching continued			<p><u>listed on the district's extra service pay schedules reviewed during the visit, were compensated by the board of education.</u> These issues need to be resolved, and school officials should be prepared to readily report the number of coaches working with student athletes at the school. (See <i>KHSAA Recommended Action</i>.) According to information provided during the visit, 33% of the head coaches of girls teams are off-campus employees while 30% of the head coaches of boys teams are employed off the school campus.</p>
Locker Rooms, Practice and Competitive Facilities	X		<p>Both the previous reports rated this benefit category <i>Satisfactory</i>. The 2006 report commended school officials for the provision of very well-appointed and maintained practice and competitive facilities. As was true in 2006, all the venues for Ohio County High School athletics were in excellent condition at the time of the most recent visit. All the practice and game facilities are located on the school campus except swimming and golf. Copies of the locker room and equipment storage assignments were in the Title IX file, and a review of these areas indicated parity. The school provides a large amount of equipment storage space which, in almost all cases, is located adjacent to the appropriate practice or game facility. School officials were commended for providing high quality locker rooms and assigning those available with parity as a priority.</p>

Medical and Training Facilities and Services	X		<p>The 2003 Title IX school visit report rated this benefit category <i>Satisfactory</i> but did request that an equitable usage schedule for the weight training rooms at the school be developed and posted at the facilities. The 2006 report continued the <i>Satisfactory</i> rating but stipulated that there still was no usage schedule showing female access to the weight training rooms. A schedule for these facilities was submitted to KHSAA on August 1, 2006. The most recent visit revealed that the school has one large weight training room which does have equipment that is suitable for use by female athletes. An equitable usage schedule for the weight room was in the Title IX file and posted at the facility. The services of an athletic trainer are provided after 4:00 pm each day through a contract with the Ohio County Hospital. According to the school's athletic director, this trainer sets up in a centralized location each day and all head coaches have her cell phone number. Ohio County Health Care, Inc. offers physical examinations at a reduced rate for athletes on two designated days each year.</p>
Publicity	X		<p>The 2002 Title IX school visit report rated this benefit category <i>Satisfactory</i> but did request that equitable written guidelines be developed for the provision of athletic recognition. The 2006 report again rated this category <i>Satisfactory</i> and stated that some limited guidelines had been developed for displays of athletic recognition. An awards and recognition policy was sent to KHSAA on August 1, 2006. During the most recent visit, information found in the student-parent athletic handbook revealed that guidelines were in place that addressed athletic lettering and provision of banquets. It is requested that school officials expand these guidelines to specifically address awards and the posting of athletic recognition for individual and teams in the public areas of the school. (See <i>KHSAA Recommended Action</i>.) The school currently has one cheerleading squad which cheers at all home football games and at all home boys and girls basketball games and at away games versus</p>

Publicity continued			district opponents. The full school band plays at all home football games. The pep band plays at all home boys and girls basketball games. The dance team performs at all home football and all home boys and girls basketball games. According to data submitted in the 2011-12 and 2012-13 annual Title IX reports, the school was spending approximately \$7 per female athlete and \$10 per male athlete for awards.
Support Services	X		Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . According to information gathered during the most recent visit, the athletic booster club situation has changed significantly since the 2006 visit. The school currently has one booster club that houses all its funds off the school campus. Any head coach may request funds from the booster club, and these requests can be accepted or rejected. <u>There is no mechanism in place at this time for any type of school approval for booster expenditures.</u> Although athletic spending for the past two years appears to have been within acceptable parameters when using the percentage method, it is <u>strongly suggested that the school attempt to put some process in place for oversight of booster expenditures for the provision of parity.</u>
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		



--	--	--	--

5. Brief Summary/Analysis of the Title IX Improvement Plan (Form T-60)

The school's most recent T-60 forms call for the following:

- monitoring of athletic expenditures in an attempt to provide equitable benefits;
- addressing the indicated interests shown on the student athletic interest survey.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The one deficiency that is designated as a result of the January 23, 2014 school visit is in the area of ***Accommodation of Interests and Abilities***. The school has provided no documentation that it is meeting the standards established in any of the three tests for provision of athletic opportunities. (See *KHSAA Recommended Action in relation to new deficiencies*.)

There are also some "areas of concern" within the benefit categories of *Scheduling of Games and Practice Times*, *Coaching*, and *Publicity* that need to be addressed in an attempt to avoid developing future deficiencies. (See *KHSAA Recommended Action in relation to new deficiencies*.)

7. KHSAA Recommended Action in relation to new deficiencies

**Accommodation of Interests and Abilities**—On or before **April 25, 2014**, the school is to submit to KHSAA written documentation of the steps taken to address the indicated interest in bowling and archery shown in the 2011-12 student athletic interest survey. This documentation should include, but not be limited to, evidence of interest meetings held and the attendance at these meetings. If the attendance at these meetings suggests that the interest is authentic, the future steps to be taken by the school are to be included as well. Documentation of this endeavor is also to be a part of the school's Title IX improvement plan (T-60 form) submitted to KHSAA by April 30, 2014.

Although not currently designated as deficient, the following "areas of concern" need to be addressed in an attempt to insure that an *equivalence of benefits* is being provided.

(Scheduling of Games and Practice Times)

- On or before **April 25, 2014**, the school is to submit to KHSAA copies of the 2013-14 girls and boys cross country schedules. Also, by this date, the results of the girls and boys meets are to be posted on the KHSAA web site.
- On or before **April 25, 2014**, the school is to submit to KHSAA a written schedule for use of the school soccer fields that shows equity in relation to sharing of the game and practice fields for team practice.

(Publicity) On or before **April 25, 2014**, the school is to submit to KHSAA a written expansion of the current guidelines in this area which address the specific parameters for provision of athletic awards and the specific stipulations or requirements for the posting of both individual and team recognition in the public areas of the school—gym, gym lobby, etc. These guidelines should include, but not be limited to, banners, paintings, and pictures. This expanded document is also to become a part of the school's Title IX file.

(Coaching) On or before **April 25, 2014**, the school is to submit to KHSAA a chart showing the following:

- Column 1: All athletic teams currently sponsored at the school.
- Column 2: The total number of high school coaches (for all levels) for each of the teams in column 1.
- Column 3: The total number of high school coaches (for all levels) for each of the teams listed in column 1 that are compensated by the board of education.

This document should be accompanied by a current board-approved extra service pay schedule for coaches that is signed by the school district's Title IX coordinator.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the February 15, 2006 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Charles Patton, 732 W. 3<sup>rd</sup> Street, Beaver Dam, KY 42320  
(270) 256-1390

District Level Title IX Coordinator: Christy Nofsinger, 315 E. Union Street, Hartford, KY 42347  
(270) 298-3249

Name	Title	Telephone
Gary W. Lawson	KHSSA	(502) 545-3393
Hunter S. Klaas	Student Athlete	(270) 274-3366
Allison Druin	Student Athlete	(270) 274-3366
Billy Garner	Softball Coach	(270) 256-9172
Matt Brigance	Girls Basketball Coach	(270) 302-9581
Christy Nofsinger	District Title IX Coordinator	(270) 298-3249
Charles Patton	H. S. Title IX Coordinator	(270) 274-3366
Paul Decker	Boys Basketball Coach	(270) 274-3366
Kim Kennedy	Guidance Counselor	(270) 274-4585
Deirdre ruin	Parent	(270) 274-3366
Robby Asberry	Assistant Principal	(270) 256-1252
Gordon Bocock	KHSAA	(606) 271-0714

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:15 pm CST.