



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

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

School: Owsley County
 Prepared By: Gary W. Lawson
 Date of Re-Visit: November 10, 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
- 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
	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 to KHSAA on the T-1 forms in the annual Title IX reports, the school has met the standard established in Test 1 for provision of athletic opportunities for females as well as male athletes during each of the past three school years. The T-1 form in the 2013-14 annual report shows that female students made up 54% of the school's enrollment and 57% of their 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 rosters and information submitted as part of the annual Title IX reports for the past three years show that the school has not met the standard established in Test 2 for provision of athletic opportunities during this period of time. The 2013-14 annual Title IX report shows that one varsity team for females, archery with three 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 cannot be given credit for meeting the standard in Test 3 for two reasons. The first reason on the most recent T-3 form, the school says there is an indicated interest in soccer, but the 2013-14 student interest survey suggests there is zero (0) interest in soccer. Secondly, the interest survey shows zero (0) interest for all seven KHSAA sanctioned varsity sports that the school does not currently offer for participation.

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 December 12, 2001 Title IX school visit report deemed this area <i>Satisfactory</i> stating it appeared the school was meeting the standard established in Test 1 for the provision of athletic opportunities. The January 23, 2008 school visit report again rated this area <i>Satisfactory</i> stating it was likely the school was meeting the standards of both Test 1 and Test 2. The annual reports for the past three years provide evidence that the standard established in Test 1 is currently being met for both male and female athletes. There is a possibility that Test 3 is also being met, but the accuracy of the most recent student athletic interest survey is questionable, and the responses on the current T-3 form appear to not be substantiated. (See detailed explanation for each of the three tests on page 2 of this report.) During the most recent visit, 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 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, weight training room, and the Christian Life Center, a school-generated athletic handbook, written guidelines regarding awards and recognition of athletic accomplishments (see <i>Publicity, Support Services, and KHSAA Recommended Action</i>), written designation of locker room and athletic equipment storage space assigned each team, written minutes for Gender Equity Review Committee meetings held during the past three years, a uniform review, rotation, and/or replacement plan (see <i>Equipment and Supplies, Support Services, and KHSAA Recommended Action</i>), written regulations for the provision of per diem (see <i>Travel and Per Diem Allowances, Support Services, and KHSAA Recommendations</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (KRS160.445). School officials were</p>

Accommodation of Interests and Abilities continued			commended for the development of a comprehensive Title IX file. They were encouraged to continue to update this document.
Equipment and Supplies	X		The previous two Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The 2008 report documented that the school had a uniform review, rotation, and/or replacement plan based on a four-year cycle of review. The most recent visit again showed that the school continues to have the same uniform rotation plan in place. Not included in this plan were golf and archery which replace their uniforms each year. UPON RECEIPT OF THIS REPORT, THIS PLAN IS TO BE EXPANDED TO INCLUDE BOTH BOYS AND GIRLS GOLF AND ARCHERY. All the uniforms seen during the most recent visit were of mid-to-high quality, and appeared to be supplied equitably in relation to quantity. Spending within this category could not be evaluated because the school submitted budgeted rather than actual expenditures on the T-35 form in the annual report. (See <i>Support Services</i> and <i>KHSAA Recommended Action</i>).
Scheduling of Games and Practice Time	X		Both the 2001 and the 2008 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2008 report did point out that there was a disparity in relation to the number of softball games scheduled compared to those for baseball. Information provided during the most recent visit indicated that the number of competitive events scheduled for teams of "like" sports was comparable. Written facilities usage schedules were provided for the gym, weight training room, and the Christian Life Center where the gym is used by the boys and girls basketball teams. All these schedules showed evidence of the provision of equitable female access. The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the provision of parity regarding this benefit.

Travel and Per Diem Allowances	X		<p>Both the previous Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2008 report stated that the school had written guidelines for the equitable provision of this benefit. The most recent visit revealed that there are written guidelines regarding per diem (food and lodging) in the Title IX file. Interviews with student athletes and coaches indicated these guidelines are being implemented. These regulations did not include any stipulations about mode of transportation. UPON RECEIPT OF THIS REPORT, THE TRAVEL AND PER DIEM GUIDELINES ARE TO BE EXPANDED TO INCLUDE EQUITABLE PROVISION IN REGARD TO MODE OF TRANSPORTATION (school bus, charter, bus, van, etc.) The school has reported no spending for travel and per diem in the annual Title IX reports for the past three years. This made full evaluation of this benefit category very difficult. (See <i>Support Services and KHSAA Recommended Action</i>).</p>
Coaching	X		<p>The two earlier Title IX school visit reports rated this category <i>Satisfactory</i>. The school's principal and athletic directory are responsible for the evaluation of all head coaches. No written instrument is currently being used as a part of this process. According to the T-35 form in the 2013-14 annual Title IX report, the total amounts spent for coaches' salaries for teams of "like" sports appeared to be comparable. A review of the district's extra service pay schedule for coaches showed parity. According to the data in the <i>Coaching</i> column on the T-35 form, the coaching ratio is one coach per 11 participants for female athletes and one coach per nine participants for male athletes. This ratio does appear to favor male athletes. <u>The apparent difference in the accessibility of coaches should be addressed by the Gender Equity Review Committee.</u> Information provided during the visit showed that 86% (6/7) of the head coaches of girls teams are on-campus employees while 83% (5/6) of the</p>

			head coaches of boys teams are employed on the school campus.
Locker Rooms, Practice and Competitive Facilities	X		<p>The 2001 Title IX school visit report deemed this benefit category <i>Deficient</i> stating that there was a lack of amenities provided at the girls softball field compared to other outdoor venues. The 2008 report documented that a new softball field had been constructed. Lights for this field had been purchased, and based on evidence received by KHSAA, the lights were installed by May, 15, 2008. The 2008 report also suggested that the dugouts at the softball field be enclosed. The most recent visit revealed that the lights are installed and the dugouts have been enclosed at the softball field. The school has made progress in this area since the original school visit. The softball dugouts are enclosed with metal--not a block structure like baseball. The fact that the dugouts are rather small compared to those at the baseball field and considering the number of participants on the softball team, <u>this is a challenge that should be addressed by school officials and be a part of the school's Title IX Improvement Plan (T-60 form)</u>. All of the athletic venues provided by the school appear to be well maintained and amenities are equitable. Almost all of the teams' athletic equipment is stored in lockable wooden cabinets inside a large utility room at the school. All of the available locker room space seems to be assigned equitably. The school has two coaching offices—one of which serves all coaches of boys teams, and one that serves all coaches of girls teams.</p>

Medical and Training Facilities and Services	X	<p>The 2001 Title IX school visit report judged this benefit category <i>Satisfactory</i>. It did request that an equitable schedule be developed for the weight training room and be posted at the facility. The 2008 Title IX school visit report again rated this category <i>Satisfactory</i> and stated that the school had an equitable usage schedule posted at the weight training room. The most recent visit showed that the school had a small but well maintained weight training room located adjacent to the gym. There was an equitable usage schedule in the Title IX file and also posted at this facility. The weight training room does contain equipment that appears to be suitable for use by female athletes. The interviews during the visit suggested that female athletes used the facility minimally. It was emphasized that weight training should be encouraged for all athletes at the school. A nurse practitioner is available to all athletes during each home competitive event. Physical examinations are provided free of charge to any student athlete by any one of three local practicing physicians.</p>
Publicity	X	<p>Both the 2001 and 2008 Title IX school visit reports rendered this benefit category <i>Satisfactory</i>. The 2001 report requested the development of school-based regulations for the posting of athletic recognition. The 2008 report stated that written guidelines had been developed for the posting of banners in the gym. Information provided during the most recent visit showed that the school has one cheerleading squad that cheers at all home boys and girls basketball games, at away games versus district opponents, and when either team is involved in the all "A" tournament. The pep band performs at all home boys and girls basketball games and at the semi-finals and finals of the all "A" tournament if either team is competing. The Title IX file contained written guidelines for the provision of equity in relation to athletic awards and post season banquets. It was noted that <u>no post season awards banquets</u> have been held for the past three years. It is requested that upon receipt of this report, these</p>

Publicity continued			<p><u>guidelines be expanded to include the requirements for the posting of team recognition on banners posted in the gym.</u> The annual Title IX reports show <u>no spending for athletic awards</u> for the past two years. Evidence gathered during the most recent visit indicated that the school does supplement the purchase of letter jackets and bars and letters for student athletes. These expenditures should have been part of the school's report in this benefit category. (See <i>Support Services</i> and <i>KHSAA Recommended Action</i>.)</p>
Support Services		X	<p>The two earlier Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2008 report stated there were no athletic booster clubs existing at that time. The T-35 form in the 2013-14 annual Title IX report shows no booster club spending for any sport. Interviews with school officials indicated there are no athletic booster clubs supporting any teams at Owsley County High School. It was not possible to evaluate this benefit category due to the school's failure to provide complete and accurate listings of expenditures within the benefit categories of <i>Equipment and Supplies</i>, <i>Travel and Per diem Allowances</i>, and <i>Awards</i>. Since these three categories comprise a significant portion of the school's total athletic spending, this category is rendered <i>Deficient</i>. (See <i>KHSAA Recommended Action in relation to new deficiencies</i>.)</p>
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:

- development of strategies to promote increased female participation in sports;
- working with the elementary, middle school, and youth foundation to promote female participation;
- monitoring athletic spending in an attempt to insure equitable benefits are provided;
- monitoring the scheduling of practice times in an attempt to insure that parity is achieved.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

The failure of the school to report complete and accurate expenditure totals in the benefit categories of *Travel and Per Diem Allowances*, *Equipment and Supplies*, and *Awards* made these areas difficult to evaluate, but not necessarily deficient. The combination of the lack of sufficient information in all these categories does lead to a *Deficiency* in relation to total Support Services. This deficiency and the required response is addressed in section 7 of this report.

7. KHSAA Recommended Action in relation to new deficiencies

(Support Services) On or before January 26, 2015, the school is to submit to KHSAA a completed T-35 form for the 2013-14 school year showing expenditures for 2012-13 as indicated on the form. Complete and accurate expenditures under column headings Equipment and Supplies, Travel, and Awards should be included. School officials are to use this document to evaluate their expenditures for provision of parity using both the percentage and per athlete method.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were assessed by the January 23, 2008 Title IX school visit report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Gary Cornett, 177 Shepherd Rd, Booneville, KY 41314
(606) 593-5185

District Level Title IX Coordinator: Chad Mason, 14 Old KY 11, Booneville, KY 41314
(606) 567-5282

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Cami Bobrowski	Student Athlete	(606) 593-5185
Braden Haskins	Student Athlete	(606) 593-5185
Charles Davidson	Girls Basketball	(606) 593-5185
Heather Cornett	Volleyball Coach	(606) 593-5185
Gary Cornett	Principal/Athletic Director	(606) 593-5185
Chad Mason	District Athletic Director	(606) 593-6363
Noah Noble	Boys Basketball Coach	(606) 593-5185
Tim Bobrowski	Superintendent	(606) 593-6363

10. Comments

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