



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

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

School: Pendleton County High School  
 Prepared By: Kathy Johnston  
 Date of Re-Visit: September 22, 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 submitted data, it appears that Pendleton County High School is currently meeting the standard of Test 1 for the provision of athletic opportunities.

- 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: According to submitted data, it appears that Pendleton County High School is currently meeting the standard of Test 2 for the provision of athletic opportunities.

- 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: According to submitted data, it appears that Pendleton County High School is currently meeting the standard of Test 3 for the provision of athletic opportunities.

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

Comments: The most recent Student Interest Survey was conducted during the 2015-16 school year. Students in grades 8-11 were surveyed with a return rate of 80.8%.

#### 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 most recent Student Interest Survey was administered during the 2015-2016 school year. Submitted data indicated that students in grades 8-11 were surveyed with a return rate of 80.8%. Pendleton County High School offers ten (10) varsity sports for both males and females. The most recently added sports and/or sport activities include bowling and archery. According to submitted data, a total of eighteen (18) sport level opportunities are provided for females and a total of sixteen (16) for males. An interest in swimming (48), as shown on the most recent Survey, should be followed up on for validity and/or feasibility and documented on the 2017 Annual Report.</p> <p style="text-align: center;">(see KHSAA recommendation 7.a.)</p>
Equipment and Supplies	X		<p>There was written evidence of a four (4) year uniform replacement plan for all teams except golf, tennis, bowling, and archery. Evidence showed that these uniforms are purchased yearly and retained by the student. Viewed uniforms were of high quality and equivalent in the quantity provided. All other viewed equipment was well maintained and available for equitable access. An overall review of spending for this category showed that approximately \$121.00 was spent per male athlete and approximately \$100.00 spent per female athlete.</p>

Scheduling of Games and Practice Time	X		There was viewed evidence of all team schedules in the Title IX file. Current and past schedules showed overall equivalence and parity, within the like sports, regarding the number of competitive event opportunities provided. There was written evidence of a guideline that gave direction for the priority usage and equitable scheduling for the shared facility of the basketball and auxiliary gymnasiums.
Travel and Per Diem Allowances	X		There was written evidence requiring administrative oversight and approval for all travel and overnight stay. It was indicated that travel is done by school bus and occasional charter bus. There was not written criteria that indicated the specific provisions and/or parameters for mode of transport, meals, and housing. An overall review of spending for this category showed that approximately \$86.00 was spent per male athlete and approximately \$71.00 spent per female athlete.  (see KHSAA recommendation 7.b.)
Coaching	X		There was viewed evidence of a school board approved salary schedule which showed overall equivalence in the salary provided. It was also comparable in the number of coaching positions provided and showed parity for the like sports. According to submitted data, the athlete to coach ratio, with regard to accessibility, is 9:1 for males and 10:1 for females. Interviews with administration indicated that coaching evaluations are conducted by the Athletic Director, at the end of each sports season.
Locker Room,	X		There was written evidence of locker room and

Practice and Competitive Facilities			<p>storage assignment for all teams. The quality and amenities of all locker rooms are similar and comparable. On-campus facilities provide practice and competitive venues for volleyball, basketball, archery, and baseball. Off campus facilities include the Pendleton County Athletic Park for tennis, soccer, and softball; Veterans Field for football and track; and Sharp Middle School for cross country. The golf teams practice and compete at the Northern Kentucky Golf Club and the bowling teams utilize the Southern Lanes for practice and competition. All viewed facilities have similar amenities and are maintained by the Pendleton County Schools Maintenance Department. Interviews with administration indicated available school bus transportation to all venues for practice and/or competition.</p>
Medical and Training Facilities and Services	X		<p>The main weight room/conditioning area is located in the high school building, adjacent to the gymnasium. The room is very spacious, provides equitable access, and is able to accommodate large groups. A schedule showing access was posted at the site. The weight room was well equipped and with appropriate equipment for female use. There is also an available weights and conditioning area located in the Veterans Equipment Building. Interviews with students and coaches indicated usage and access to both areas, Interviews with administration indicated that Athletic Training Services are made available thru a contract with Harrison Memorial Hospital. The trainer is available on a daily basis and at all home contests. The training room office is located inside the main weight room/conditioning area. There was also viewed evidence of emergency action plans for all competitive venues.</p>

Publicity	X		There was written evidence of an awards guideline that included the provision and specifics for trophy/award display, school team awards, banner display, end-of-season recognition, and retired jerseys. There was also written evidence that included the provision for special senior athlete award(s) and recognition. A review of overall spending in this category showed that approximately \$11.00 was spent per male athlete and approximately \$12.00 spent per female athlete. Interviews with administration indicated administrative oversight relative to the equitable support provided by the school band and cheerleading groups.
Support Services	X		A two-year review of spending showed that approximately \$774.00 was spent per male athlete and approximately \$723.00 spent per female athlete. Based on submitted data, it appears that Pendleton County High School has met the parameter(s) of spending on a percentage and per athlete basis. Currently, all fundraisers and expenditures are approved by school administration. Interviews with coaches indicated knowledge of the process for approval to purchase items. All available office space appeared to be assigned equitably.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of Student Athletes	NA		

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5. Brief Summary/Analysis of the Corrective Action Plan (Form T-60)

- Research lights for baseball field

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

There were no observed deficiencies in the overall athletics program at Pendleton County High School.

7. KHSAA Recommended Action in relation to new deficiencies

Although there were no observed deficiencies, the following recommendations have been made to ensure overall equivalence:

- a. Upon receipt of this report, the Gender Equity Review Committee should review and document the follow-up of swim interest on the T-3 form of the 2017 Annual Report.
- b. Upon receipt of this report, the Gender Equity Review Committee should develop the specific provisions and/or parameters relative to mode of transport, meals, and housing for overnight stay.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

N/A

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Keith Smith                      859-628-2186

District Level Title IX Coordinator: Sommer Rosa                      859-659-6911

Name	Title	Telephone
Laura Buck	Volleyball Coach	859-472-7000
Brendan Neltner	Student athlete	859-472-7000
Shelby Shaefer	Student athlete	859-472-7000
Barb Ritter	Bookkeeper – high school	859-472-7000



Stacey Myers	Coach / School	859-472-7000
David Myer	Coach / Teacher	859-472-7000
Mary Pettit	Softball Coach	859-472-7000
Amy McKinney	Parent / Booster	859-472-7000
Carrie Wade	Asst. Principal - MS	859-472-7000
J Fugate	Parent / Booster	859-472-7000
Sommer Rosa	District Coordinator	859-654-6911
Chad Simms	Principal – High School	859-654-3355
David Sledd	Principal	859-472-7000
Scott Colbin	Sharp Site Manager	859-801-0466
Keith Smith	PC Athletics Director	859-628-2186
Kathy Johnston	KHSAA Auditor	859-494-2509 kjohnston@khsaa.org

10. Comments -

The school Title IX file of Pendleton County High School was complete and very well organized. The school is to be commended for its committee member participation for the report presentation. Interviews with coaches, students, and administration were informative and positive. The public forum, scheduled for 3:00 pm was held in the Board Room, located in the Sharp Middle School. With no one in attendance, the auditor left the school at approximately 3:20 pm.