



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

(For schools re-visited during the 2011-2012 school year)

School: Perry County Central
 Prepared By: Gary W. Lawson
 Date of Re-Visit: October 3, 2011
 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)

	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 data and calculations submitted by the school and corrected by KHSAA representatives, the school has not met the standard established in Test 1 for provision of athletic opportunities during any of the past three school years.

- 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 submitted on the T-2 forms appears to be incorrect. The counting of the number of teams added during the past five years is likely in error. Therefore, it is impossible to ascertain if the standard established in this test has been met during any of the past three years or the current year. (See Accommodations of Interests and Abilities and KHSAA Recommended Action.)

- 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 data submitted by the school indicate that the standard established in Test 3 for provision of athletic opportunities has been met during each of the past three school years. The school's most recent student athletic interest survey appears to support the responses on the T-3 form.

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

Comments: Documentation submitted in the 2009-10 annual report indicates that an 83% return 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 data and responses submitted by the school along with documentation of the pursuit of the interest in and ultimate reinstatement of the girls cross country team make compliance with the standard established in Test 3 for provision of athletic opportunities likely. The school currently offers all KHSAA sanctioned sports for girls at the varsity level except swimming. Fourteen total team opportunities are offered for participation by females and males. KHSAA representatives reviewed the school's Title IX file. It was found to contain the original Title IX audit report from October 9, 2003, all annual reports to KHSAA for the past five years, a board approved extra service pay schedule for coaches, a current listing of all Gender Equity Review Committee members, the most recent game schedules for all school sponsored sports, a written booster agreement for the school's one club, written usage schedules for all shared athletic facilities, written guidelines regarding awards and recognition of athletic accomplishments for both genders, a written designation of locker room and storage space assigned to each team, written Gender Equity Review Committee meeting minutes for the past three years, equitable written guidelines for the provision of travel and per diem, and some written guidelines for the equitable review, rotation, and/or replacement of uniforms. The uniform guidelines provided did not show the specific intervals for replacement for each team. (See Equipment and Supplies and KHSAA Recommended Action.) School officials were complimented for the development and maintenance of a comprehensive Title IX file.</p>
Equipment and Supplies	X		<p>The October 9, 2003 audit report rated this benefit category as satisfactory but did suggest that an equitable uniform review, rotation, and/or replacement plan be developed. The recent visit revealed that uniform replacement guidelines had been developed based on a</p>

<p>Equipment and Supplies</p> <p>(continued)</p>			<p>three-year cycle. The current plan does not show what the three-year cycle is for each team. (See KHSAA Recommended Action.) Interviews with coaches and students indicated that some teams may not have adhered to the three-year rotation. (See KHSAA Recommended Action.) All uniforms reviewed during the visit appeared to be equitable in both quality and quantity provided. Data submitted on the 2009-10 and 2010-11 annual reports showed that the school was spending approximately \$182 per female athlete and \$268 per male athlete for equipment and supplies.</p>
<p>Scheduling of Games and Practice Time</p>	<p>X</p>		<p>The October 9, 2003 audit report deemed this benefit area as satisfactory but alerted school officials that the number of prime date girls basketball games was below the KHSAA established minimum standard. Posted results on the KHSAA web site show that the girls basketball team played 25% (2/8) of their home games on prime dates in 2010-11. This again was below the KHSAA standard. The school requested and was granted a weather-related waiver for prime date play in girls basketball for the 2010-11 season by the assistant KHSAA commissioner. New KHSAA requirements for prime date and prime time play were discussed with school officials. KHSAA representatives emphasized the importance of meeting minimum standards in this endeavor. Information in the school's Title IX file showed that the number of regular season games scheduled by teams of "like" sports were comparable. The scheduling of all shared practice facilities appeared equitable.</p>
<p>Travel and Per Diem Allowances</p>	<p>X</p>		<p>This benefit category was rated as satisfactory in the October 9, 2003 audit report. The recent visit showed that the school had a comprehensive set of written guidelines for provision of equitable travel and per diem. According to data submitted in the 2009-10 and 2010-11 annual reports, the school was spending approximately \$159 per female athlete and approximately \$97 per male athlete</p>

			for provision of this benefit.
Coaching	X		A review of the total amounts of money spent for coaching salaries for "like" sports shows equivalence in the 2010-11 annual report. The school district's extra service pay schedule for coaches indicated parity. Overall, the number of coaches provided for "like" sports is comparable. Information given by school officials during the recent visit indicated that only one head coach (boys soccer) is an off campus employee. Interviews during the visit suggested that coaches were very accessible to student athletes at the school.
Locker Rooms, Practice and Competitive Facilities	X		The October 9, 2003 audit report deemed this benefit category as satisfactory. The report emphasized the need for upgrading the school's softball field. It was requested that, in the short term, water and electricity be supplied to the field while, in the long term, the school should begin work with the city of Hazard to place lights at the field. The recent visit showed that the school had a very good quality <u>electric scoreboard</u> , and the field is now lighted. The dugouts have also been improved. The school is still trying to work with city officials to supply water to the field. This process should continue and <u>be documented on the school's annual reports to KHSAA</u> . School officials were commended for improvements made in amenities at the softball field. The other venues observed during the visit reflected the school's commitment to providing first rate facilities on an equitable basis. All student athletes are provided a dressing room and each team has a designated equipment storage area. All coaches, except boys and girls golf, are provided an office. The school's volleyball, wrestling, and football facilities are located at the old M.C. Napier High School which is about one mile from Perry County Central.

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Medical and Training Facilities and Services	X		<p>The school currently has two designated weight training rooms. One weight room is at the old M. C. Napier High School and is used only by the football team. Weight Room #2 is located at Perry Co. Central and is shared by all other teams. An equitable usage schedule for Weight Room #2 was found in the Title IX file and posted at the facility. Weight Room #2 appeared accessible to female athletes and contained equipment appropriate for their use. The school does not currently provide the services of an athletic trainer. A local physician's assistant and two chiropractors provide physical examinations to all athletes free of charge on designated days.</p>
Publicity	X		<p>This area was rendered as deficient on the October 9, 2003 audit report. It emphasized what appeared to be the inequitable system for the selection and assignment of the school's two cheerleading squads. The recent visit showed that the school now has only one cheerleading squad that is assigned to cheer at all home football and boys and girls basketball games. They also cheer at away games versus district opponents, teams from adjoining counties, and at all post season games for all three teams. The school's pep band plays at all home and post season games for the football and boys and girls basketball teams. The school's Title IX file contained equitable written guidelines for the posting of athletic recognition at the school. The 2009-10 and 2010-11 annual reports indicated that approximately \$23 per female and approximately \$29 per male athlete is spent for awards.</p>
Support Services	X		<p>The October 9, 2003 audit report rendered this benefit area to be satisfactory but did request that athletic spending be closely monitored for provision of equity in all areas. <u>This monitoring was to include booster club spending.</u> The school currently has one booster club (boys basketball) with which the school has a written</p>

Support Services (continued)			agreement. School officials stated that they have no plan or guidelines in place for administrative monitoring of booster club spending. (See KHSAA Recommended Action.) An analysis of school athletic spending over the past two years shows that expenditures for athletic support in 2009-10 and 2010-11 were within acceptable parameters on both a percentage and per athlete basis.
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 Corrective Action plans call for the following:

- purchasing new weight room equipment;
- renovating the seating area at the volleyball facility;
- seeding the softball field;

- purchasing new soccer goals;
- upgrading the soccer field;
- constructing a new baseball and softball field house.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated during the recent school visit. The deficiency identified in the October 9, 2003 audit report in the area of Publicity appears to have been addressed. (See KHSAA Recommended Action in relation to re-occurring deficiencies.) There were a few "areas of concern" designated which need to be addressed. (See KHSAA Recommended Action in relation to new deficiencies.)

7. KHSAA Recommended Action in relation to new deficiencies

No new deficiencies were designated by the October 9, 2003 school visit. The following "areas of concern" need to be addressed in order for the school to maintain its non-deficient status.

(Accommodations of Interests and Abilities) In order to gain information and instructions regarding the completion of accurate reports, the school's Title IX coordinator is to attend a KHSAA sponsored Title IX workshop. A copy of a certificate verifying attendance is to be submitted to KHSAA on or before December 16, 2011.

(Equipment and Supplies) On or before December 16, 2011, the school is to submit to KHSAA a written uniform review, rotation, and/or replacement plan showing the intervals of review or rotation for each team with specific years. This document is also to include written designation of the person(s) responsible for monitoring the implementation of this plan.

(Support Services) On or before December 16, 2011, the school is to submit to KHSAA the process it has in place for monitoring booster club spending for the provision of equitable benefits. This document is also to include the person(s) responsible for oversight in this area.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The school appears to have successfully addressed the deficiency designated in the area of Publicity by the October 9, 2003 audit report. The school has decreased the number of cheerleading squads from two to one, and the assignment of this squad seems to show equivalence of support.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Randy Napier, 305 Park Ave, Hazard, KY 41701 (606) 439-5888

District Level Title IX Coordinator: Michael A. Smith, 315 Park Ave., Hazard, KY 41701
(606) 439-5813 Ext. 1231

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Susie Sizemore	Booster Club Representative	(606) 233-4864
Allan Hatcher	Boys Basketball Coach	(606) 439-5888
Randy Napier	Girls Basketball Coach, A. D.	((606) 439-5888
Estill Neace	Principal	(606) 439-5888
Trevor Combs	Student Athlete	(606) 216-7312
Randi-Carol Napier	Student Athlete	(606) 233-9905
Michael A. Smith	District Title IX Coordinator	(606) 439-5813 X 1231
Reba Woodall	KHSAA	(859) 299-5472

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 5:15 pm EDT.