



KHSAA TITLE IX RE-VISIT FINAL AUDIT REPORT

(For schools re-visited during the 2012-2013 school year)

School: Phelps High School
 Prepared By: Kathy Johnston
 Date of Re-Visit: November 29, 2012
 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 data and reports submitted for the years 2010-2012, it appears that Phelps High School has met 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 the data and reports submitted for the years 2010-2012, it appears that Phelps High School has not met 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 the data and reports submitted for the years 2010-2012, it appears that Phelps High School does not meet the standard of Test 3 for the provision of athletic opportunities. Submitted documentation reported on the most recent T-3 form indicated 'no' interest for girls, however, the most recent Student Interest Survey showed significant interest in girls tennis, soccer, bowling, and track.

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

Comments: According to submitted reports, the most recent Student Interest Survey was conducted during the 2011-2012 school year. Students in grade 8-11 were surveyed with a return rate of 96%.

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 conducted during the 2011-2012 school year. Students in grades 8-11 were surveyed with a return rate of 96%. The submitted T-3 summary form indicated interest in bass fishing, wrestling, and archery for boys but showed no indicated interest for girls, when in fact, there was significant interest shown in girls tennis (30), track (16), bowling (15), and soccer (35). In order to meet the standard for Accommodation of Interests and Abilities all indicated interests must be recognized and pursued for validity and feasibility.</p> <p>(see item # 7.)</p> <p>According to the data and reports submitted, Phelps High School offers six (6) levels of play for females and six (6) levels of play for males. Four varsity sports are consistent for both females and males. It appears that golf and cross country is offered yearly but due to a sometime lack of interest, a team may not be filled. Interviews with administration indicate that the addition of a wrestling team would occur for the 2012-2013 season.</p>
Equipment and Supplies	x		<p>Uniforms viewed appeared to be of mid to high quality and comparable in quantity provided. There was no written evidence of a uniform review and/or rotation plan that provided for equity and administrative oversight. A two-year review of expenditures in this area falls within the acceptable parameter on a percentage and per athlete basis.</p> <p>(see KHSAA recommendation a.)</p>

Scheduling of Games and Practice Time	x		Equitable, written plans were viewed regarding the use of the gym as a shared facility. Team schedules were viewed that showed comparable number of competitive event opportunities for all sports and parity for the like sports.
Travel and Per Diem Allowances	x		There was written evidence of a guideline for meal provision allowance for athletic teams. There was no written evidence regarding the mode of transportation and housing (overnight stay) parameters. Interviews with students and coaches indicated the use of school provided transport for all competitive events. (see recommendation b.)
Coaching	x		There was written evidence of a school board approved pay schedule of coaching positions that showed equivalence in number of positions and parity for the like sports. Submitted data indicates that the ratio of student to coach access is 11:1 for females and 13:1 for males. The school is to be commended for its number of on-campus head coaches. Interviews with administration discovered that the school reported number of coaches only included those that receive a board approved stipend. To accurately evaluate access, all individuals who meet the requirements of KHSAA by-law 27, and are actively coaching, should be counted for the teams listed in this category.

Locker Rooms, Practice and Competitive Facilities		x	<p>All viewed locker rooms appeared to be comparable and with similar amenities. There was written evidence of locker room and storage space assignment for teams. Currently, the only competitive facility that is in use is the gymnasium which supports volleyball, wrestling, girls and boys basketball. The previously shared field for baseball and softball and the football field have been leveled to make way for a new elementary school. Interviews with administration indicate that most all games for football, baseball, and softball are played away. The football team practices on an area of land (approximately 50 yards in length) off campus, approximately 1 mile from school. This past season, Phelps played three (3) games on the Belfry field that they counted as home contests. The baseball and softball teams practice at off campus facilities which are owned by outside agencies and have only secondary or less priority for use. The baseball practice area is approximately 22 miles away and the softball practice area is approximately 7 miles away. The viewed lack of amenities and regulations at these facilities would make playing competitive events very difficult. The Title IX Audit Reports of 2005 and 2009 reported a deficiency in this area, particular to the continued lack of development and progress for the construction of a softball facility. Although the circumstances, at the current time, are unusual with the loss of the football and baseball facility, this benefit area remains deficient as there was no viewed evidence for the future development of a softball facility. Even though interviews with the District Athletic Director and the Assistant Superintendent indicated ready funds for this project, there was no viewed evidence of a projected timeline for acquisition of property, architectural drawings or plan of development for said property.</p> <p>(see item # 8.)</p>

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<p>Medical and Training Facilities and Services</p>	<p>x</p>		<p>There is one weight room located in the same building that connects to the football locker room. It provides a separate entrance for equitable access and an installed double door between the football locker room area and the weight room that can be closed to insure privacy. There was minimal viewed equipment for female use. There was a universal machine that could be a benefit, however, it was located in the football locker room area and available access to this equipment could not be determined. There was written evidence of an equitable weight room usage schedule, but it was not posted at the site.</p> <p>(see KHSAA recommendation c.)</p> <p>There are currently no athletic training services but athletic physicals are provided free to all athletes, through the local health department, at the end of each school year.</p>
<p>Publicity</p>	<p>x</p>		<p>There was written evidence of an awards guideline that included criteria for banner and jersey display. Interviews with coaches and administration indicated criteria for team awards and recognition through end of season banquets.</p> <p>(see KHSAA recommendation d.)</p> <p>There was evidence of printed schedules, done on a seasonal basis, for all sports teams. Interviews with students, coaches, and administration presented differences in the amount of cheerleading support for the various teams. The determination of equitable support and administrative oversight could not be determined.</p> <p>(see KHSAA recommendation e.)</p>

Support Services	x		<p>An evaluation of the reported overall spending for the last two (2) years shows that the school meets the acceptable expenditure parameters both on a percentage and per athlete basis. Interviews with administration indicate that there are no outside booster accounts and that all fundraising funds are deposited in school accounts, however, other interviews indicate that an outside booster club account may exist.</p> <p>(see KHSAA recommendation f.)</p> <p>To accurately evaluate expenditures in benefit areas, all monies, regardless of source, must be reported.</p>
Athletic Scholarships			N/A
Tutoring			N/A
Housing and Dining Facilities and Services			N/A
Recruitment of Student Athletes			N/A

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

- new softball field at site of previous elementary school

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

There were two (2) observed deficiencies in the overall athletics program at Phelps High School. These deficiencies were in the areas of Accommodation of Interests and Abilities and in Locker Rooms, Practice, and Competitive Facilities.

7. KHSAA Recommended Action in relation to new deficiencies

Accommodation of Interests and Abilities

Please submit to the KHSAA, no later than **February 15, 2013**, documented evidence for

pursuance and feasibility of girls tennis, track, bowling, and soccer. This documentation should include meeting dates (minimum of 2), meeting agendas, sign-in sheets showing attendance, and minutes of said meetings. Upon submission, this should also be made part of the school's Gender Equity Review Committee minutes and the permanent Title IX file.

The following are not deficiencies, but recommendations that need to be addressed:

- a. Please submit to the KHSAA, no later than **February 15, 2013**, a uniform rotation plan that provides for the review and/or replacement of uniforms. This plan should show a complete cycle of review that would insure equity and show parity for the like sports.
- b. Please submit to the KHSAA, no later than **February 15, 2013**, an expanded travel and per diem guideline that would include written mode of transportation and expenditure parameters for housing (hotel overnight stay). This plan should insure overall equity and monitored with administrative oversight.
- c. Upon receipt of this report, written evidence of the weight room usage schedule should be posted within the weight room. It is also recommended that the Gender Equity Review Committee evaluate the equipment in the weight room and determine its value of use by females.

- d. Upon receipt of this report, the Gender Equity Review Committee should expand the existing awards guideline to include, but not be limited to, the provision of team awards and end of season banquet recognition that will insure equity and monitored with administrative oversight.
- e. Please submit to the KHSAA, no later than **January 30, 2013**, a printed calendar schedule showing dates of cheerleading support for the girls and boys basketball games for this season. This document is to be signed by the cheerleading coach and principal.
- f. Please submit to the KHSAA, no later than **January 30, 2013**, a signed document from the Principal of Phelps High School indicating the status of any and all 'active' booster clubs.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

Locker Room, Practice, and Competitive Facilities

Please submit to the KHSAA, no later than **January 30, 2013**, written evidence of the school board's commitment with projected timeline, architectural drawings, and plan for development of acquired property for the construction of a softball facility. Follow-up reports outlining development and progress shall be submitted every ninety (90) days. The first of these reports shall be due **March 1, 2013**.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jason Sanson, Asst. Principal/Athletic Director 606-456-3482

District Level Title IX Coordinator: Ancie Casey 606-433-9286

Name	Title	Telephone
Caitlyn Norman	Student	606-456-4716
Steven Prater	Student	606-456-4437
Deborah Stiltner	Coach	606-456-7434
Bobby Varney	Coach	606-369-4484
David B. Akers	Coach	606-456-4024
Jason Sanson	Coordinator	606-262-2588
Gary Lawson	KHSAA	502-545-3393
Stephanie Prater	Parent	606-456-4437
Kathy Johnston	KHSAA	859-494-2509

10. Comments

The permanent Title IX file appeared to be complete and in good order. Administration and staff were very helpful during the visit. The public forum, scheduled for 3:00 pm, was held in the Phelps High School library. With no one in attendance, the audit team left the building at approximately 3:10 pm.