



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

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

School: Somerset
Prepared By: Gary W. Lawson
Date of Re-Visit: December 4, 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
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: The rosters and data submitted to KHSAA in the 2013-14 annual Title IX report indicate that the school is meeting the standard established in Test 1 for provision of athletic opportunities. The report shows that female students comprised 50% of the enrollment and 48% of the 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: Compliance with Test 2 could not be substantiated because the T-2 form in the 2013-14 annual Title IX report was submitted incorrectly. This form showed all teams currently sponsored by the school had been added during the past five years. The previous two annual reports showed that no teams for females had 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: According to the responses and information submitted, the school appears to be meeting the standard established in Test 3 for the provision of athletic opportunities. The responses on the most recent student athletic interest survey support the opinion that student interests are being accommodated. It should be noted that the T-3 form shows that the school is following up on the indicated interest (three students) in bowling.

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

Comments: The information submitted on the T-63 form in the 2013-14 annual Title IX report shows that a 100% completion 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 November 9, 1999 Title IX school visit report rated this area <i>Satisfactory</i>. The report noted that the school appeared to be meeting the standard established in both Test 2 and 3 for the provision of athletic opportunities. The October 31, 2007 school visit report again rated this area <i>Satisfactory</i>. The school appeared to be meeting the standards established in both Tests 1 and 3. According to information provided in the three most recent annual Title IX reports, the school is likely meeting the standards of both Tests 1 and 3. The percentage of participation for females is consistently within three percent of the percentage of female enrollment. The T-3 forms and the student athletic interest survey provide evidence that steps have been taken to address significant student interest in sports. (See detailed explanation for all three opportunities tests on page 2 of this report.) During the most recent school visit the Title IX file was examined and found to contain the two previous Title IX school visit reports, all annual Title IX reports for the past five years, a board-approved extra service pay schedule for coaches, a list of the current members of the Gender Equity Review Committee, several documents related to the KHSAA investigation of the softball facility and the improvements and upgrades made at that venue, game schedules for all school sponsored varsity teams, an athletic program which recognized all school sponsored teams, written and signed agreements with all existing booster clubs, facility usage schedules for both weight training rooms, the gym, and the indoor hitting facility (see <i>Scheduling of Games and Practice Times</i>), written guidelines regarding awards and recognition of athletic accomplishments, written designation of the locker room and athletic equipment storage space assigned each team, written minutes for Gender Equity Review Committee meetings held during the last three years, a written uniform review, rotation, and/or replacement plan, written regulations addressing athletic travel and per</p>

Accommodation of Interests and Abilities continued			diem (see <i>Travel and Per Diem Allowances</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (160.445). School officials were commended for the development and maintenance of a comprehensive Title IX file.
Equipment and Supplies	X		The 1999 and the 2007 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2007 report stated that the school had a uniform review, rotation, and/or replacement plan based on a three-year cycle of review and that spending within this category favored male athletes. The most recent visit revealed that the school had a uniform rotation and/or replacement plan based on a four-year cycle of review except for boys and girls golf and boys and girls tennis who have their uniforms replaced annually. The school also purchases five replacement uniforms for football each year. Interviews with coaches indicated that there was some confusion about when uniforms could be purchased. <u>School administrators assured the KHSAA representative that the uniform plan was followed, and a purchase order system was used for these purchases.</u> All uniforms reviewed during the most recent visit were of mid-to-high quality and appeared to be supplied equitably in regards to quantity. The data submitted in the 2012-13 and 2013-14 annual reports indicated that the school was spending approximately \$204 per female athlete and \$214 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> . Information gathered during the most recent visit indicated that the number of competitive events scheduled for teams of "like" sports showed overall parity. It appeared that the softball team had a slight advantage compared to baseball and boys golf had a slight advantage compared to girls golf. An equitable usage schedule was available for the gym, both weight training rooms, and the indoor hitting facility. Upon receipt of this report, a

Scheduling of Games and Practice Time continued			usage schedule is to be developed for the "plateau" practice field located at the middle school which is shared by the boys and girls soccer teams. Updated copies of this schedule are to become part of the school's Title IX file. The benefit of scheduling competitive events during the most opportune playing times was discussed with school officials who were commended for provision of parity in this effort.
Travel and Per Diem Allowances	X		Both previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The review of the Title IX file showed that equitable written regulations were in place addressing provision of per diem (meals and lodging) for student athletes. These guidelines did not address the equitable provision of the mode of transportation. (See <i>KHSAA Recommended Action</i> .) Information submitted in the 2012-13 and 2013-14 annual Title IX reports showed that the school was spending approximately \$120 per female athlete and \$101 per male athlete for travel and per diem.
Coaching	X		The 1999 and 2007 Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The principal and athletic director are responsible for the evaluation of all head coaches. A written instrument is used as part of this evaluation process. The data submitted on the T-35 form in the 2013-14 annual Title IX report shows that the total amounts spent for coaching salaries for teams of "like" sports were comparable. A review of the district's extra service pay schedule for coaches showed parity. Information in the 2013-14 annual Title IX report indicates that the coaching ratio is one coach per 14 participants for both male and female athletes. It was revealed that 50% (3/8) of the head coaches of girls teams and 62% (5/8) of the head coaches of boys teams are on-campus employees.
Locker Rooms, Practice and Competitive Facilities	X		The 1999 Title IX school visit report rated this benefit category <i>Deficient</i> . The major reason was the disparity in amenities provided at outdoor competitive facilities especially those at the softball field. The 2007 report rated this

<p>Locker Rooms, Practice and Competitive Facilities continued</p>		<p>category <i>Satisfactory</i> stating that a renovation of the softball complex was in its final phase. The amenities being added or improved included the press box, dugouts, public restrooms, a small dressing area, equipment storage area, and public address system. The most recent visit revealed that the softball field additions and upgrades were complete. The on-campus softball field now provides comparable amenities to those at the off-campus baseball field. The indoor hitting facility located adjacent to the baseball field appears to be shared equitably. The lights at the softball field are scheduled to be relocated due to construction at the elementary school adjacent to the field. The school's three on-campus tennis courts are being renovated. Both the boys and girls tennis teams are currently competing at the Eagles Nest Country Club located about three miles from the school. Plans are being developed for renovations and upgrades at the on-campus soccer field. All the other competitive facilities appeared to provide equitable amenities. During the tour of facilities, the athletic director pointed out the locker room space provided for every school sponsored team. Only two teams (baseball and softball) have exclusive use of a locker room. The shared locker space seems to be assigned equitably. All teams are allotted athletic equipment storage space. These spaces appear to be assigned equitably in regard to size and proximity to the team's competitive facility.</p>
--	--	--

<p>Medical and Training Facilities and Services</p>	<p>X</p>	<p>The 1999 Title IX school visit report deemed this benefit category <i>Deficient</i> stating it appeared that female athletes were not provided equitable access to the weight room or the athletic training room. The 2007 school visit report rated this category <i>Satisfactory</i> while documenting the school then had two weight training rooms—one for boys and one for girls—and that the girls weight room seemed to be adequately equipped. The school also had two athletic training rooms with ample supplies that appeared to be equally accessible for all athletic teams. The most recent visit indicated that the school continues to have two weight training rooms. One is adjacent to the gym and is shared by the boys and girls basketball teams. This room had a significant amount of training equipment that is suitable for use by females. Weight room 2 is located in the field house and is used by all teams except boys and girls basketball. Weight room 2 has equipment suitable for female use but not as much as in weight room 1. Equitable usage schedules for both these facilities were in the Title IX file, but were not posted at the venues. <u>Upon receipt of this report, copies of the usage schedules are to be posted at both weight training rooms.</u> The school has a large, well stocked athletic training room. A trainer is provided on an equitable basis to all student athletes through a contract with P.T.Therapy. All student athletes are responsible for getting their own physical examinations.</p>
<p>Publicity</p>	<p>X</p>	<p>The two earlier Title IX school visit reports designated this benefit category <i>Satisfactory</i>. The school currently sponsors one varsity cheerleading squad. This squad cheers at all home football games and also at away games versus in-county rivals and at all post season contests. During basketball season, they cheer at all home, post season and away games versus in-county rivals for both the boys and girls teams. The full band performs at all home football games. The pep band performs at an equal number of home boys and home girls basketball games as monitored by the athletic director. A dance team is being organized at</p>

Publicity continued			<p>this time but do not perform at school athletic events at this time. A comprehensive set of written guidelines for this benefit category were part of the Title IX file. These guidelines addressed the posting of athletic banners in the gym, athletic awards, and post season banquets as well as the requirements for induction into the school's athletic hall of fame. According to data provided in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$39 per female athlete and \$22 per male athlete for awards.</p>
Support Services	X		<p>The 1999 Title IX school visit report designated this benefit category <i>Satisfactory</i>. The 2007 report rated this category <i>Deficient</i> stating that athletic expenditures had been outside of generally accepted parameters for the provision of parity for at least two consecutive years. It appeared at that time that at least part of the problem stemmed from inaccurate reporting on the T-35 and T-36 forms. This situation seemed to be addressed by the submittal of <u>corrected T-35 and T-36 forms</u> to KHSAA on or about February 15, 2008. The school currently has athletic booster clubs for all teams except boys and girls cross country, boys and girls golf, boys and girls tennis, boys and girls track, and volleyball. These clubs seem to be very active and generate a lot of funding at this time. All booster clubs house their funds outside of school accounts. The school does have written agreements with each booster club. An analysis of athletic expenditures for the past two years shows that this spending is very marginal in relation to being within acceptable parameters for the provision of equitable benefits. The internal analysis sheet provided in the 2012-13 annual Title IX report shows that 38% of the expenditures were for female athletes who made up 42% of the participants and 62% of the expenditures were for male athletes who were 58% of the participants. This translates into approximately \$558 per female athlete and \$669 per male athlete being spent. On a percentage basis these expenditures may be acceptable, but they are slightly outside of the acceptable range on a per athlete basis. In</p>

Support Services continued			2013-14, again the spending was marginally acceptable on a percentage basis and outside of generally accepted parameters for a football playing school on a per athlete basis (\$615 per female athlete and \$772 per male athlete). Although this spending is an improvement in relation to the situation that existed in 2007, it still an "area of concern" that needs continuing attention. (See <i>KHSAA Recommended Action</i> .)
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:

- developing a feeder program for volleyball;
- encouraging participation in girls golf;
- administering the student athletic interest survey every year rather than every other year as required;
- continuing to monitor the student interest in bowling;

- attempting to re-instate the swimming program.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the December 4, 2014 Title IX school visit. There are a few "areas of concern" in relation to equitable scheduling of practice times at the soccer field (see *Scheduling of Games and Practice Times*), equitable provision of the mode of transportation for athletic trips (see *Travel and Per Diem Allowances* and *KHSAA Recommended Action*), provision of evidence of equitable scheduling and use of the weight training rooms (see *Medical and Training Facilities and Services*), and the oversight of expenditures for the provision of equitable benefits for student athletes (see *Support Services* and *KHSAA Recommended Action*).

7. KHSAA Recommended Action in relation to new deficiencies

Although no new deficiencies were designated in the body of this report, it is requested that the following benefit categories be addressed in an effort to prevent development of future deficiencies.

(Travel and Per Diem Allowances) On or before **March 27, 2015**, the school is to submit to KHSAA an expansion of the current written guidelines regarding travel and per diem that specifically address the equitable provision of the "mode of transportation" (school bus, van, charter bus) to be used for athletic trips. This expansion should also become a part of the school's Title IX file.

(Support Services) On or before **March 27, 2015**, the school is to submit to KHSAA a written delineation of the process to be used by school administrators to monitor (approve) athletic spending by booster clubs in order to bring about the provision of equitable benefits for student athletes. School administrators are encouraged to include this process in the written booster club agreements that are signed each year.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency in the benefit category of *Support Services* designated by the October 31, 2007 school visit report was addressed by the submittal of corrected T-35 and T-36 forms in February, 2008. Although not considered to be currently deficient, there are still some concerns about athletic spending which are discussed and addressed in section 4 (Support Services), and sections 6 and 7 of this report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Robert Tucker, 301 College St., Somerset, KY 42501
(606) 875-8365

District Level Title IX Coordinator: Boyd Randolph, 305 College St., Somerset, KY 42501
(606) 679-4451

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
David Dorsey	Softball	(606) 678-4721
Erin Mullins	Girls Soccer	(606) 416-2695
Samantha Heuer	Student Athlete	(606) 678-4721
Kenny Spear	Student Athlete	(606) 678-4721
B. B. Tucker	Athletic Director	(606) 875-8365
Boyd Randolph	Superintendent	(606) 678-4721
Wesley Cornett	Principal	(606) 678-4721
Jeff Cothron	Boys Basketball	(606) 678-4721
Allison Murray	Parent/Secretary	(606) 678-4721
Steve Wallace	Boys Soccer/B and G Track	(606) 678-4721

10. Comments

Two

members of the community attended the Public Comments session. Their major concern was the assignment of locker rooms for teams. The school's athletic director as well as the KHSAA representative provided the requested information about locker room assignments. The meeting was adjourned at 3:55 pm EST.