



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

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

School: Washington County  
Prepared By: Gary W. Lawson  
Date of Re-Visit: January 10, 2013  
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)

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 submitted, the school has met the standard established in Test 1 for provision of athletic opportunities during only one of the past three school years (2010-11) and is not currently meeting that standard. The counting of participants and calculations of this test has been a long term problem at this school. The team rosters submitted to KHSAA must be accurate in order to be able to make a correct assessment in relation to Test 1.

- 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 information submitted indicates that the school has not met the standard established in Test 2 for provision of athletic opportunities during any of the past three school years. The T-2 form submitted as part of the 2011-12 annual report indicates that one varsity team for girls with approximately 15 participants has been added during the past five years. Again, counting of participants appears to be a problem. The 2010-11 annual report shows 151 male participants while the 2011-12 report shows 237 male participating.

- 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 on the T-3 form and in the most recent student athletic interest survey, the school is not meeting the standard established in Test 3 for provision of athletic opportunities. It must be documented that the indicated interests in girls cross country (42) and bowling (27 girls) have been pursued for authenticity before this standard can be met.

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 18, 2001 Title IX school visit report rendered this category <i>Deficient</i> stating the school appeared not to be meeting the standard established in any of the three tests for provision of athletic opportunities. The October 16, 2008 report changed this rating to <i>Satisfactory</i> citing the fact that after several corrections in calculations on Test 1 were made by KHSAA representatives, it was likely that the standard established in this test was being met. A review of the annual reports for the past three years indicates that the school is again <i>Deficient</i> in this area. The data and responses show that the minimum standard is not being met in relation to any of the three tests. <u>School officials are reminded that failure to provide equitable opportunities has been designated as the most serious deficiency in the Title IX evaluation</u> Accurate counting of participants and/or posting of rosters has been a persistent problem in relation to Tests 1 and 2. In regard to Test 3, the indicated interests in Girls cross country (42) and bowling (27 girls) must be addressed for validity. If it is decided that either of these interests is genuine, documentation of the steps taken to provide the activity should be included in order for the standard of this test to be met. (see <i>KHSAA Recommended Action</i>.) The school's most recent Title IX improvement plans were reviewed. These plans appear to address relevant challenges, but they <u>did not</u> list appropriate completion dates. More realistic dates for completion of projects were requested. The school's Title IX file was reviewed and found to contain the two previous school visit reports as well as the annual reports submitted to KHSAA for the past five years. The file also contained a board-approved extra service pay schedule for coaches, a list of the current members of the Gender Equity Review Committee, sample game schedules for all school sponsored sports, a game program for girls and boys basketball, a school-generated handbook for</p>

<p>Accommodation of Interests and Abilities</p> <p>continued</p>			<p>coaches, a written facility usage schedule for the gym, written guidelines regarding awards and recognition of athletic accomplishments (see <i>Publicity and KHSAA Recommended Action</i>), a written designation of the locker room and athletic equipment storage space assigned each team, all required Title IX report follow up correspondence submitted to KHSAA, a written uniform review, rotation, and/or replacement plan, some vague statements relating to the provision of travel and per diem (see <i>Travel and Per Diem and KHSAA Recommended Action</i>), and some written minutes for Gender Equity Review Committee meetings held during the past three years. <u>It was emphasized to school officials that minutes should be more detailed and the agendas addressed during these meetings should be relevant Title IX concerns.</u></p>
<p>Equipment and Supplies</p>	<p>X</p>		<p>The 2001 and 2008 school visit reports rendered this benefit category <i>Satisfactory</i>. The 2008 report stated that although the school had a uniform review, rotation, and/or replacement plan, the interviews with coaches indicated that <u>boosters were not required to adhere to this plan.</u> The most recent visit showed that the school has a uniform review plan in place based on a four-year cycle. Interviews with coaches indicated that the plan was being followed. The uniforms and equipment reviewed during the visit appeared to be of mid-to-high quality and was provided on an equitable basis. According to the data submitted in the 2011-12 annual Title IX report, the school was spending approximately \$27 per female athlete and \$22 per male athlete for equipment and supplies. SCHOOL OFFICIALS WERE REMINDED THAT BOOSTER CLUB EXPENDITURES WERE TO BE INCLUDED IN THIS CATEGORY.</p>
<p>Scheduling of Games and Practice Time</p>	<p>X</p>		<p>Both the previous school visit reports rated this benefit category <i>Satisfactory</i>. Information gathered during the most recent visit showed</p>

<p>Scheduling of Games and Practice Time</p> <p>continued</p>			<p>that the number of competitive events scheduled for teams of “like” sports was comparable. All the shared practice facilities seemed to be assigned equitably. Written facility usage schedules were in place for the gym and the weight training room. The scheduling of athletic events during optimal playing times for both genders was discussed with school officials who were commended for the provision of parity in this regard.</p>
<p>Travel and Per Diem Allowances</p>		<p>X</p>	<p>Both the 2001 and 2008 school visit reports deemed this benefit category <i>Satisfactory</i>. The review of the Title IX file revealed that some vague statements were in place relating to provision of travel and per diem. These statements did not address provision of equity in relation to this benefit. (See <i>KHSAA Recommended Action</i>). An evaluation of spending within this benefit category could not be completed due to the failure of the school to submit accurate expenditures on the T-35 and T-36 forms. The inaccuracy of data along with the lack of equitable written guidelines or policies renders this benefit category <i>Deficient</i> at this time. (See <i>KHSAA Recommended Action</i>.)</p>
<p>Coaching</p>	<p>X</p>		<p>The school was rendered <i>Satisfactory</i> in this benefit category in both the previous Title IX school visit reports. According to data in the 2011-12 annual report, the total amount spent for coaching salaries for teams of “like” sports is comparable. A review of the district’s extra service pay schedule showed parity. The ratio of coaches to participants was 1 to 16 for girls and 1 to 17 for boys. There was some question as to why the T-35 and T-36 forms showed softball having one coach for two teams and baseball having three coaches for three teams. School administrators are reviewing this situation and developing a plan to provide more equitable coaching accessibility in relation to softball. Information gathered during the visit indicated that 67% of the head coaches of girls teams are employed off</p>

			campus while 50% of the head coaches of boys teams are off-campus employees.
Locker Rooms, Practice and Competitive Facilities	X		The 2001 school visit report rated this category <i>Deficient</i> . There were significant differences in the amenities provided at the softball facility compared to baseball. Additionally, the dressing area and the practice and game facility used by girls basketball was inferior to that provided for boys basketball. At that time, the girls team practiced and played at the elementary school. The 2008 school visit report deemed this area <i>Satisfactory</i> stating that the boys and girls basketball teams now share the high school gym and locker rooms at that facility. The report also cited that while there were still a few disparities, the amenities at the softball field were improved since the first visit. The review of competitive facilities during the most recent visit showed further improvements have been made at the softball facility. The current amenities provided for softball appear to be equivalent to those at other outdoor athletic facilities. Although locker room space and athletic equipment storage space is in short supply, the available space appears to be assigned equitably. The school district is in the process of constructing a new high school which is expected to have significantly more dressing room and storage space. There appeared to be a conscious effort to provide each coach an office space at the school.

Medical and Training Facilities and Services	X		<p>The 2001 school visit report rated this benefit category <i>Satisfactory</i> but did state that “there was no evidence of provision of female access to the weight training room and most of the equipment provided was not suitable for use by female athletes.” The 2008 school visit report changed the status to <i>Deficient</i> stating there appeared to be no change in the situation that existed in 2001. There was no documentation of female access to the weight training room and there was still very little, if any, equipment provided that could be used by females. The most recent visit revealed that the school had documentation of equitable access to the weight training room and a usage schedule was posted at the facility. Interviews with female student athletes confirmed their use of this training area. UPON RECEIPT OF THIS REPORT, A COPY OF THE WEIGHT ROOM USAGE SCHEDULE SHOULD BE PLACED IN THE TITLE IX FILE. It was also suggested to school officials that the addition of more equipment suitable for use by female would be a further move in a positive direction. An athletic trainer is available to all athletes on a daily basis through a contract with C.O.R.T. Physical Therapy of Lebanon, KY. All student athletes are responsible for getting their own physical examinations.</p>
Publicity	X		<p>Both the previous reports deemed this benefit category <i>Satisfactory</i>. Both reports documented the need for equitable written guidelines in this area. The 2008 report stated that the school had guidelines for awards and trophies but not for the posting of athletic recognition in the public areas of the school. The most recent visit showed that guidelines were now in place addressing jersey retirement, trophies, letters and bars. These guidelines did not include the posting of team banners in the gym. (See <i>KHSAA Recommended Action</i>.) The school has one cheerleading squad that cheers at all home games and at away games during the post season for the football, boys basketball, and</p>

Publicity continued			girls basketball teams. The school does not currently have a mascot or dance team. Spending in this category could not be evaluated due to inaccurate data on the T-35 and T-36 forms. (See <i>KHSAA Recommended Action.</i> )
Support Services	X		The 2001 and 2008 school visit reports rated this benefit category <i>Satisfactory</i> . The 2008 report documented that there appeared to be no administrative oversight of booster spending. The most recent visit revealed that all school teams except boys and girls tennis, boys and girls track, and boys and girls golf have active booster clubs. These booster clubs all have off-campus bank accounts, and there apparently is little, if any, monitoring of their expenditures for the provision of equity. (See <i>KHSAA Recommended Action.</i> ) It was difficult to analyze the spending for athletic benefits over a two-year period due to the fact that it is very likely that several expenditure categories on the T-35 and T-36 forms are incorrect. (See <i>KHSAA Recommended Action in Relation to Travel and Per Diem, and Publicity.</i> ) These expenditures, as submitted, appear to be within generally accepted parameters for the provision of parity on a percentage basis in 2010-11 and on both a percentage and per athlete basis in 2011-12. It was strongly emphasized to school administrators that correct data should be submitted to KHSAA, and this data should be analyzed annually for provision of equity.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		
Recruitment of	NA		



Student Athletes			
------------------	--	--	--

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

The school's most recent T-60 forms call for the following:

- pursuing the indicated interest in girls cross country and bowling for validity;
- attendance of the school's athletic director at Title IX training;
- hiring of a certified athletic trainer;
- replacement of the volleyball net system;
- review and analysis of athletic expenditures in relation to provision of parity.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

There are deficiencies designated in this report in the categories of *Accommodation of Interests and Abilities* and *Travel and Per Diem Allowances*. The failure of the school to submit accurate and complete data in relation to both these areas has been a long term issue. During the most recent visit, school administrators seemed to be sincere in their attempts to address this challenge. (See *KHSAA Recommended Action in relation to new deficiencies*.) There are also some areas of concern within the categories of *Publicity* and *Support Services*. These areas should be addressed in an effort to prevent the development of future deficiencies.

7. KHSAA Recommended Action in relation to new deficiencies

(Accommodation of Interests and Abilities) On or before April 2, 2013, the school is to submit to KHSAA written documentation of the steps taken to address the indicated interests in girls cross country and bowling. This documentation is to include, but not be limited to, the results of meetings with students and/or parents in regard to these two sports. This documentation is also to be a part of the T-3 and T-60 forms submitted in the April 30, 2013 Title IX report.

(Travel and Per Diem Allowances)

On or before April 2, 2013, the school is to submit to KHSAA written guidelines relating to the equitable provision of travel and per diem for student athletes. These guidelines should address the mode of transportation and provision of meals and motel rooms.

On or before April 2, 2013, the school is to submit T-35 and T-36 forms for school year 2011-12 to KHSAA. These forms are to reflect data for 2010-11. The expenditures listed in the travel and per diem column are to be both complete and accurate.

Although not currently designated as deficient, the following *areas of concern* should be addressed in an attempt to insure an equivalence of benefits is provided.

(Publicity)

On or before April 2, 2013, the school is to submit to KHSAA an expansion of the current written guidelines relating to athletic recognition which address the posting of team banners in the gym.

On or before April 2, 2013, the school is to submit to KHSAA T-35 and T-36 forms for the 2011-12 school year (showing data from 2010-11) that list complete and accurate expenditures in the *Awards* column.

(Support Services) On or before April 2, 2013, the school is to submit to KHSAA a description of the procedure in place for monitoring athletic expenditures by booster clubs for the provision of equitable benefits. This description should also include the school personnel responsible for this monitoring.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The school appears to have successfully addressed the deficiency designated by the October 16, 2008 school visit report in the area of *Medical and Training Facilities and Services* by documenting equitable female access to the weight training room. This access was further verified during the school visit by interviews with student athletes and coaches.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jeff Tingle, 426 Tingle Lane, Springfield, KY 40069  
(859) 336-5475

District Level Title IX Coordinator: Chad Willis, 192 Mackville Hill Rd, Springfield, KY 40069  
(859) 336-5470

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 875-3817
Anne Mudd	Volleyball/ Bookkeeper	(859) 336-5475
Bernard Smalley	Girls Basketball	(859) 336-5475
Roniesha Caldwell	Student Athlete	(859) 336-5475
LeeAnn Abell	Student Athlete	(859) 336-5475
Paul Terrell	Principal	(859) 336-5475
Jeff Tingle	Athletic Director	(859) 336-5475
Chad Willis	District Title IX Coordinator	(859) 336-5470

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:35 pm EST.