



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

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

School: Williamsburg  
Prepared By: Gary W. Lawson  
Date of Re-Visit: October 12, 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)

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 rosters and data submitted, the school has not met the standard established for Test 1 for provision of athletic opportunities during either of the past two school years. The 2015-16 annual Title IX report shows that females made up 43.75% of the school's athletic participants, and they were 50.7% of the enrollment. The internal audit summary for the 2015-16 annual report shows that the minimum standard was not met for any of the subtests relating 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 rosters and information submitted by the school indicates that the standard established by Test 2 for the provision of athletic opportunities has not been met during either of the past two school years. The most recent T-2 form shows that two teams have been added for female competition during the past five years. These teams currently have approximately 25 participants which increase the total percent of female participation to 15.5%.

- 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 T-3 form submitted in the 2015-16 annual Title IX report was inaccurate and could not be used as a supporting document for Test 3. A corrected form was submitted to KHSAA (see *Exhibit 1* in the Title IX file) which showed indicated interests in soccer (28), volleyball (33), bowling (17), and swimming (17). The school offered no evidence that these indicated interests were being addressed in any way.

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

Comments: The T-63 form originally submitted in the 2015-16 annual Title IX report showed that a 100% completion rate was received on the most recent student athletic interest survey. However, the totals entered for compilation of each sport/sport activity was incorrect. A corrected form was sent to KHSAA which appeared to be accurate. (See "C" above and *Accommodation of Interests and Abilities* on page 3 of this report.)

#### 4. Checklist of the Title IX Components of the Interscholastic Program

Benefit to Students	Satisfactory	Deficient	Comments
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Accommodation of Interests and Abilities		X	<p>The October 4, 2001 Title IX school visit report deemed this category <i>Satisfactory</i> based on information showing the standard established by Test 3 was being met. The February 10, 2011 Title IX school visit report rated the area <i>Satisfactory</i> based on the fact that the standard established by Test 2 was being met. Review of the school's annual reports for the past two years indicate that the school is not currently meeting the standard established by any of the three opportunities tests. The internal audit summary for 2015-16 shows that the school is not meeting the minimum standard of any of the subtests relating to Test 1. In regard to Test 2, the percentage of participation for female participation has been increased less than 25% (15.5%) by adding teams during the last five years. In addressing compliance for Test 3, the school submitted an inaccurate T-63 form for the Student Athletic Interest Survey in the 2015-16 annual report. When a corrected form was submitted, it was discovered that there was significant indicated interests in several sports. The school provided no evidence that these indicated interests were being addressed for validity. (See detailed explanation for all three opportunities tests on page 2 of this report.) The lack of documentation showing that at least one of the three opportunities tests is being met renders this area to be <b>deficient</b>. School officials were reminded that a <i>deficiency</i> in provision of opportunities has been designated as the most serious type in the Title IX evaluation. (See <i>KHSAA Recommended Action</i>.) The Title IX file was reviewed during the visit. It was found to contain all the school's annual reports for the past five years, the two previous Title IX school visit reports, a board-approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, current game schedules for all school-sponsored varsity teams, an athletic handbook for coaches, guidelines regarding the posting of athletic banners and other forms of athletic recognition (See <i>Publicity</i>), a written assignment of each team's locker room space,</p>
Accommodation of Interests and Abilities			

continued			minutes for <i>only one</i> Gender Equity Review Committee meeting which was held during the 2016-17 school year (see <i>KHSAA Recommended Action</i> ), a uniform review, rotation, and/or replacement plan, written regulations regarding the provision of meals for student athletes (see <i>Travel and Per Diem</i> and <i>KHSAA Recommended Action</i> ), and an Emergency Medical Plan which included stipulations for athletic venues. School officials were encouraged to work toward the development of a comprehensive Title IX file.
Equipment and Supplies	X		Both the 2001 and the 2011 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The 2011 report requested that the school develop and implement an equitable uniform review, rotation, and/or replacement plan. The most recent visit revealed the school had a uniform review/rotation plan based on a four-year cycle of rotation for all teams except girls tennis and boys and girls golf which have uniforms replaced each year. All uniforms and equipment observed during the visit appeared to be of mid-to-high quality and seemed to be supplied in equitable quantities. BECAUSE INACCURATE and INCOMPLETE ROSTERS WERE SUBMITTED IN THE 2014-15 ANNUAL TITLE IX REPORTS, ONLY THE DATA FROM 2015-16 WAS USED TO EVALUATE SPENDING. According to data provided in the 2015-16 annual Title IX report, the school was spending approximately \$181 per female athlete and \$169 per male athlete for equipment and supplies.



Coaching continued		<p>evaluating all head coaches. A written instrument is not used as a part of this evaluation. According to information found on the T-35 form in the 2015-16 annual Title IX report, 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 indicated parity. Coaching accessibility could not be fully analyzed because the <i>Coaching</i> column (number of coaches per team) submitted on the T-35 form in the 2015-16 annual report was incorrect. (See <i>KHSAA Recommended Action</i>.) Information gathered during the visit indicated that 83% (5/16) of the head coaches of girls teams and 100% (6/6) of the head coaches of boys teams are on-campus employees.</p>
Locker Room, Practice and Competitive Facilities	X	<p>Both the earlier Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The 2001 report documented that the male athletes had an advantage in the locker room space provided. The 2011 report stated that the school did not provide a listing of locker room assignments, and the amenities at the baseball field were far superior to those at the softball field. The most recent visit revealed that both the softball and baseball fields are located at the Briar Creek Park which is about one half mile from the school. The fields offer very similar amenities except the baseball field has an enclosed hitting facility adjacent to this venue and softball does not. The school offered no usage schedule showing female access to this facility. (See <i>Scheduling of Games and Practice Times</i> and <i>KHSAA Recommended Action</i>.) All the other competitive venues appeared to have equitable amenities. The school has five locker rooms for student athletes. Boys and girls basketball and football have exclusive dressing facilities which provide similar amenities. The remaining two locker rooms are shared by all other school-sponsored teams One is for boys teams and the other is for girls teams. During the facilities tour, equipment storage areas were shown for all teams. These areas appeared to have equitable space. The school’s Title IX file did not contain a listing of the</p>



			equipment storage areas as requested. (See <i>KHSAA Recommended Action</i> .)
Medical and Training Facilities and Services	X		The 2001 and 2011 Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2011 report stated that more equipment suitable for use by female athletes was needed in the weight training facility. The most recent visit showed that the school has two weight training facilities—one located in the gym and the other is adjacent to the football facility. Interviews with students, coaches, and administrators indicated some female use of both venues, but no complete usage schedule showing female access was available. (See <i>Scheduling of Games and Practice Times</i> and <i>KHSAA Recommended Action</i> .) The weight room in the gym appeared to have numerous training options that were suitable for female athletes, but as was true at the time of the 2011 visit, the weight room near the football field seemed to have minimal equipment suitable for use by females. Interviews with student athletes support this observation. (See <i>KHSAA Recommended Action</i> .) A certified trainer, provided through a contract with the University of the Columbians, attends all home and away football games and all home boys and girls basketball games. Physical examinations are offered to all student athletes free of charge on three designated days during the year.
Medical and Training Facilities and Services continued			
Publicity	X		Both the 2001 and 2011 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . The 2011 report requested that regulations be developed to address equity in relation to the posting of banners and giving awards. The school currently sponsors one varsity cheerleading squad that cheers at all home and away football games. They also cheer at all home games and at away games when playing district opponents for the boys and girls basketball teams. The band plays at all home football games and the pep band performs at three selected home games for girls basketball and the same number for home games for boys basketball. A local radio station broadcasts all home and away football games. This station also broadcasts boys and girls

<p>PUBLICITY continued</p>		<p>basketball games, but the exact number was not known at the time of the recent visit. (See <i>KHSAA Recommended Action</i>.) The Title IX file contained equitable guidelines for the provision of letters and bars, athletic awards, postseason banquets, and the posting of athletic banners for team accomplishments. UPON RECEIPT OF THIS REPORT, THE SCHOOL IS REQUESTED TO EXPAND THE BANNER GUIDELINES TO INCLUDE RECOGNITION OF <u>INDIVIDUAL</u> ATHLETIC ACCOMPLISHMENTS. <b>The spending within this benefit category could not be evaluated because of the inaccuracy of the rosters in the 2014-15 annual report. The 2015-16 annual report shows “\$0” spent for all teams in the awards category.</b> However, school officials maintain that the submitted spending for awards was inaccurate. (See <i>KHSAA Recommended Action</i>.)</p>
<p>Support Services</p>	<p>X</p>	<p>The two previous Title IX school visit reports rated this benefit category <i>Satisfactory</i>. The tour of facilities during the most recent visit revealed that the office space provided for coaches, as well as the amenities at those offices, favored the coaches of male teams. The offices for coaches of boys basketball and football were superior to the one for the coaches of girls basketball. (See <i>KHSAA Recommended Action</i>.) The school currently has active booster clubs supporting all school-sponsored teams. These clubs house their funds in off-campus accounts, and there is no system in place for monitoring booster spending in regard to the provision of equitable benefits. <u>IT WAS STRONGLY RECOMMENDED TO SCHOOL OFFICIALS THAT A MECHANISM BE IMPLEMENTED TO INSURE OVERSIGHT OF BOOSTER SPENDING FOR THE PROVISION OF PARITY.</u> <b>Athletic expenditures for 2014-15 could not be analyzed because the rosters submitted in the annual report for that year were incomplete.</b> The internal audit summary for the 2015-16 annual Title IX report showed that 42% of the athletic expenditures were for female athletes who made up 44% of the participants and 58% were for male athletes</p>

			who made up 56% of the participants. This translates into approximately \$392 being spent per female athlete and \$421 per male athlete for total support.
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 T-60 forms call for the following:

**attempting to address the male advantage in provision of equipment and supplies.**

It should be noted that the same one item for improvement has been shown on the T-60 form for two consecutive years. There is no evidence that any actual steps have been taken to address the situation identified above.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

Major deficiencies in **Accommodation of Student Interests and Abilities** and in **Scheduling of Games and Practice Times** were assessed as a result of the October 12, 2016 Title IX school visit. The primary cause of the first deficiency is the lack of evidence that the standard established in any of the three opportunities tests is being met. The other factor in assessing the second deficiency is the lack of evidence that equitable female access is being provided for shared practice venues. (See *KHSAA Recommended Action*.)

There were several areas of concern listed in this report which require attention by school administrators and the Gender Equity Review Committee. They include the following:

- submission of inaccurate team rosters;
- lack of evidence that the school has addressed indicated student athletic interests; (See *KHSAA Recommended Action*.)
- no written regulations regarding provision of the mode of team transportation and lodging for student athletes. (See *Travel and Per Diem and KHSAA Recommended Action*.)
- no written minutes for any Gender Equity Review Committee meetings held during 2014-15 or 2015-16. (See *Accommodation of Interests and Abilities and KHSAA Recommended Action*.)
- inaccurate reporting of the number of coaches provided for school teams on the T-35 form in the 2015-16 annual Title IX report. (See *Coaching and KHSAA Recommended Action*.)
- lack of any listing showing the assignment of equipment storage space for each team as requested as a part of the audit; (See *Locker Rooms, Practice, and Competitive Facilities and KHSAA Recommended Action*.)
- lack of equipment suitable for use by female athletes in weight training room 2 (adjacent to the football field) which had been a documented issue in the February 10, 2011 school visit report; (See *Medical and Training Facilities and Services and KHSAA Recommended Action*.)
- possible inequity of support by local media; (See *Publicity and KHSAA Recommended Action*.)
- inaccurate amounts of spending in the *Awards* column on the most recent T-35 form; (See *Publicity and KHSAA Recommended Action*.)
- the disparity in the office areas of coaches of female teams and coaches of male teams. (See *Support Services and KHSAA Recommended Action*.)

7. KHSAA Recommended Action in relation to new deficiencies

**(Accommodation of Interests and Abilities)**

On or before January 9, 2017, the school is to submit to KHSAA written documentation of the steps being taken to address the indicated interests in soccer, volleyball, bowling, and swimming shown in the 2015-16 Student Athletic Interest Survey. This documentation should include, but not be limited to, evidence of meetings held to assess interest and the attendance at these meetings. If the number of people attending these meetings indicates the interest is authentic, the future steps to be taken by the school to pursue these interests are to be included in this documentation. This information is also to be a part of the T-3 form submitted on the April 30, 2017 annual Title IX report.

On or before April 26, 2017, the school is to submit to KHSAA written minutes for three Gender Equity Review Committee meetings held during the 2016-17 school year.

**(Scheduling of Games and Practice Times)** On or before January 9, 2017, the school is to submit to KHSAA usage schedules for the gym, both the school's weight training rooms, and the enclosed hitting facility at Brian Creek Park which show equitable female access to each of these practice and training venues. These schedules should be placed in the Title IX file and updated to keep them current.

Although not considered to be deficient at this time, the following "areas of concern" need to be addressed in an effort to insure equitable benefits are provided.

(Travel and Per Diem Allowances) On or before January 9, 2017, the school is to submit to KHSAA an expansion of the current guidelines for travel and per diem that addresses equitable provision in regard to mode of transportation and lodging for student athletes.

(Coaching) The school's April 30, 2017 annual report to KHSAA is to include an accurate number of coaches for all school sponsored teams in the Coaching column on the T-35 form.

(Locker Rooms, Practice, and Competitive Facilities) On or before January 9, 2017, the school is to submit to KHSAA a listing of the athletic equipment storage space assigned each team. This listing is to be placed in the school's Title IX file.

(Medical and Training Facilities and Services) On or before January 9, 2017, the school is to submit to KHSAA the steps being taken to provide equipment suitable for use by female athletes in Weight Training Room 2 located adjacent to the football facility. These steps should also be listed on the T-60 form (School Improvement Plan) in the 2016-17 annual Title IX report.

(Publicity)

On or before January 9, 2017, the school is to submit to KHSAA a schedule of football and boys and girls basketball games to be broadcast by the local radio station during the 2016-17 school year.

The T-35 form in the April 30, 2017 annual Title IX report is to include complete and accurate spending amounts in the **Awards** column.

(Support Services)

The T-60 form (School Improvement Plan) in the April 30, 2017 Title IX annual report is to include steps being taken to provide equivalence in relation to offices for coaches of male teams when compared to offices for coaches of female teams.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated by the February 10, 2011 Title IX school visit report.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: John F. Harris, 1000 Main St., Williamsburg, KY 40769  
(606) 521-5400

District Level Title IX Coordinator: John F. Harris, 1000 Main St., Williamsburg, KY 40769  
(606) 521-5400

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Eli Mattingly	Student Athlete	(606) 521-5400
Lillie Abbott	Student Athlete	(606) 521-5400
Jason Prewitt	Softball Coach	(606) 521-5400
Steven Moses	Girls Track Coach	(606) 521-5400
Tim Melton	Principal	(606) 549-6044
Michael Abbott	Secondary Dean	(606) 549-6044
Amon W. Couch	Superintendent	(606) 549-6044
Dana Hale	Director of Special Education	(606) 549-6044
John F. Harris	Athletic Director	(606) 549-6044

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:20 EDT.