



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

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

School: Williamstown
 Prepared By: Gary W. Lawson
 Date of Re-Visit: 9/30/14
 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)

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: According to rosters and data submitted in the annual Title IX reports, the school has met the standard established in Test 1 for provision of athletic opportunities for females during each of the past three school years. During that three-year period, the percentage of athletic participation for female students has been higher than the percentage of participation for male students. The 2013-14 annual report shows that females were 53.6% of the school's enrollment, and they made up 55.5% of the school's athletic participation.

- 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: Because of the addition of teams in archery and tennis, the school met the standard established in Test 2 for provision of athletic opportunities for females in 2011-12. During the past two years, the increase in participation from the addition of these teams has been below the 25% which is required to meet the test.

- 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 information on the T-3 forms indicate that the school has met the standard established in Test 3 for the provision of opportunities during each of the past three school years. The data provided in the two most recent student athletic interest surveys appear to support the responses given on the T-3 forms.

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

Comments: Information provided 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 October 17, 2001 Title IX school visit report rated this area <i>Satisfactory</i> because it appeared the school was meeting the standard established in Test 3 for provision of athletic opportunities. The November 20, 2006 school visit again rated this area <i>Satisfactory</i> because it appeared the school was meeting the standard of Test 1. Annual reports for the most recent last three years indicate that the standards in both Tests 1 and 3 are currently being met. The school has apparently added sports as deemed necessary by the student athletic interest survey. (See detailed explanation for each of the three tests on page 2 of this report.) During the most recent visit, the school's Title IX file was reviewed. It was found to contain all the school's annual Title IX reports for the past five years, a board-approved extra service pay schedule, a list of the current members of the Gender Equity Review Committee, game schedules for all school sponsored sports, a school-generated athletic handbook, a written facility usage schedule for the gym, written guidelines regarding awards and recognition of athletic accomplishments for both genders, written description of amenities provided by athletic facilities which did not show specific locker room assignments (see <i>Locker Rooms, Practice and Competitive Facilities</i> and <i>KHSAA Recommended Action</i>), written designation of the athletic equipment storage spaces assigned to each team, written minutes for all Gender Equity Review Committee meetings for the past three years, a written uniform purchase plan that did not show a full cycle of rotation (see <i>Equipment and Supplies</i> and <i>KHSAA Recommended Action</i>), some random statements relating to the provision of athletic travel (see <i>Travel and Per Diem</i> and <i>KHSAA Recommended Action</i>), and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). School officials were encouraged to work with the Gender Equity Review Committee to develop a comprehensive and functional Title IX file. IT</p>

Accommodation of Interests and Abilities continued			SHOULD BE NOTED THAT THE SCHOOL'S FILE DID NOT CONTAIN EITHER OF THE PREVIOUS TITLE IX SCHOOL VISIT REPORTS. COPIES OF THESE REPORTS WERE GIVEN TO SCHOOL OFFICIALS BY THE KHSAA REPRESENTATIVE WHO CONDUCTED THE SCHOOL VISIT.
Equipment and Supplies		X	The 2001 Title IX school visit report deemed this benefit category <i>Deficient</i> stating that it appeared school submittals to KHSAA in relation to this benefit had been inaccurate for the previous two years. The 2006 report rated this category <i>Satisfactory</i> documenting that accurate data had been submitted. This second report did request that the school's uniform review, rotation, and/or replacement plan be expanded and improved. The most recent visit showed that the school does <u>not</u> have a uniform rotation/review plan showing a full cycle of rotation for all sports. All the uniforms seen during this visit were of mid-to-high quality and appeared to be supplied equitably. According to data submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$14 per female athlete and \$6 per male athlete for equipment and supplies. THE AMOUNTS SUBMITTED ON THE T-35 FORM FOR EQUIPMENT AND SUPPLIES APPEARED TO BE <u>VERY SMALL</u> . Interviews with the athletic director and coaches indicated these expenditures were incorrect. The lack of availability of accurate expenditures and a complete uniform review/rotation plan meant that an evaluation was not possible and rendered this category to be currently <u>deficient</u> . (See <i>KHSAA Recommended Action</i> .)
Scheduling of Games and Practice Time	X		Both the 2001 and 2006 Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . Information gathered during the most recent visit showed that the number of competitive events scheduled for teams of "like" sports showed parity. An equitable usage schedule was provided for the gym. The only other shared practice facility was the weight

Scheduling of Games and Practice Time continued			<p>training room which is addressed in the <i>Medical and Training Facilities</i> section of this report.</p> <p>The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the provision of parity regarding this benefit.</p>
Travel and Per Diem Allowances	X		<p>Both the previous school visit reports assessed this benefit category <i>Satisfactory</i>. The 2006 report did state that the school had failed to submit a complete listing of travel and per diem expenditures. The expenditures submitted on the T-35 form in the 2013-14 annual report seems to be complete. The Title IX file <u>did not</u> contain written guidelines for the provision of equity within this benefit category. (See <i>KHSAA Recommended Action</i>.) According to the data submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$30 per female athlete and \$22 per male athlete for travel and per diem.</p>
Coaching	X		<p>The 2001 Title IX school visit report rendered this category <i>Deficient</i> because the school did not submit the total salaries for all coaches. The 2006 report rated this category <i>Satisfactory</i>. The school's athletic director is responsible for evaluating all head coaches. There is no written instrument currently being used for this evaluation. According to information submitted on the T-35 form in the 2013-14 annual report, the total amounts spent for coaching salaries for teams of "like" sports was comparable. A review of the school district's extra service pay schedule showed parity. Although there was an error in the coaching column on the T-35 form, it does appear that the number of coaches provided for teams of "like" sports was equitable. According to information gathered during this visit, 67% of the head coaches of girls teams and 40% of the head coaches of boys teams are employed on-campus.</p>
Locker Rooms,		X	The 2001 report designated this benefit

<p>Practice and Competitive Facilities</p>		<p>category <i>Deficient</i> stating that the off-campus softball field was not the same quality as the on-campus baseball field. The 2006 report rated this category <i>Satisfactory</i> documenting that a new on-campus softball field had been constructed. The field was complete at the time of the 2006 visit except for the public restrooms. The most recent visit revealed that <u>the public restrooms still are not completed.</u> This situation is a contributing factor in the amenities provided for softball not being equivalent to those for baseball. The press box at the baseball field is larger and offers a clearer view of the field than the one at the softball field. The baseball field has a permanent public address system and the softball field does not. (See <i>KHSAA Recommended Action.</i>) The tour of facilities gave indication that locker room assignments are equitable, but a listing of the assignments was not available in the Title IX file. (See <i>KHSAA Recommended Action.</i>) There was actually more dressing room space available on the school campus that appeared to be unassigned. The available athletic equipment storage space seemed to be assigned equitably. All other practice and competitive facilities appeared to provide equivalent amenities. The failure of the school to continue to make progress at the softball field since 2006 is the major factor in rendering this category <u>deficient.</u></p>
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Medical and Training Facilities and Services		X	Both the previous Title IX school visit reports concluded this benefit category was <i>Satisfactory</i> . Both reports noted there was <u>no usage schedule posted at the weight training facility</u> . The school currently has a weight training room adjacent to a storage facility on the high school campus. This room has several universal machines and an exercise bike that appears to be appropriate for use by female athletes. <u>As was the case in 2001 and 2006, there was no usage schedule showing equitable female access to this facility in the Title IX file or posted at the facility.</u> This continued failure to show any provision for female access to this facility renders this benefit category to be <u>deficient</u> . No athletic training services are provided for any students. All student athletes are responsible for getting their own physical examinations.
Publicity	X		Both previous school visit reports rated this benefit category <i>Satisfactory</i> . The school currently sponsors one cheerleading squad that is assigned to cheer at all home boys and girls' basketball games. They also cheer at all regular season and post season tournaments for both teams. The band performs at six selected home games for boys' basketball and the same number for girls basketball. The Title IX file contained equitable written guidelines for the posting of banners in the gym, provision of athletic awards and trophies, and post season banquets. Spending in the <i>awards</i> category could not be evaluated because the expenditures submitted on the T-35 form for this benefit category appeared to be incorrect. Interviews with school officials reinforced this fact. (See <i>KHSAA Recommended Action</i> .)
Support Services	X		The 2001 school visit report deemed this benefit category <i>Satisfactory</i> . The 2006 report rated this category <i>Deficient</i> stating that the school failed to report expenditures correctly in regard to several of the benefit categories. The school's most recent report shows no booster club spending for any sport. School officials stated that no booster clubs are currently in

Support Services continued			existence. Interviews indicated that athletic teams are involved in several fundraising activities. An analysis of spending for the past two years shows that athletic expenditures in 2012-13 were well within acceptable parameters for the provision of parity on both a percentage and per athlete basis for a non-football playing school. An analysis of spending for 2013-14 could not be completed at the time of this report because inaccurate data was submitted on the T-35 form. This analysis will be completed once accurate information is submitted. (See <i>Equipment and Supplies, Publicity, and 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 Corrective Action Plan (Form T-60)

THIS REPORT WILL SERVE AS DOCUMENTATION THAT THE SCHOOL SUBMITTED AN EXTREMELY VAGUE *SCHOOL IMPROVEMENT PLAN* IN 2011-12 AND HAS SUBMITTED A BLANK T-60 FORM FOR THE PAST TWO YEARS. (SEE *Observed Deficiencies* section of this report.)

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

As was reported in Section 5 of this report, the school has failed to submit a Title IX Improvement Plan to KHSAA for the past two years. Considering the number of deficiencies and areas of concern listed in this report, this should not be an issue in the future. The deficiencies listed in the body of this report are in the areas of Equipment and Supplies, Locker Rooms, Practice and Competitive Facilities, and Medical and Training Facilities and Services. There are also *areas of concern* within the benefit categories of *Travel and Per Diem* and *Publicity*. The Gender Equity Review Committee, in cooperation with school officials, should address these issues in a timely manner and report all progress made on The T-60 form (Title IX Improvement Plan).

7. KHSAA Recommended Action in relation to new deficiencies

(Equipment and Supplies)

On or before January 9, 2015, the school is to submit a corrected T-35 form for school year 2013-14 (document will show expenditures for 2012-13) which has complete and correct expenditures for all teams in the area of *Equipment and Supplies*.

On or before January 9, 2015, the school is to submit to KHSAA a uniform review, rotation, and/or replacement plan that shows a full cycle of rotation for all school sponsored sports. This document is to be signed by the school's principal, athletic director, and the head coaches of all school sponsored teams. A copy of this document is also to become part of the Title IX file. Documentation of the completion of this endeavor is to be included in the school's April 30, 2015 Title IX Improvement Plan (T-60 form) submitted to KHSAA.

(Locker Rooms, Practice and Competitive Facilities)

On or before January 9, 2015, the school is to submit to KHSAA a written plan for the improvement in the amenities provided at the softball field. These improvements should include, but not necessarily limited to, the provision of public restrooms, an upgraded press box, and a permanent public address system. This plan is to include realistic completion dates for all projects. Starting on March 30, 2015 (after the plan has been submitted), progress reports are to be sent every 60 days to KHSAA until the project is completed. Both this plan and the progress reports are to be part of the school's April 30, 2015 T-60 form submitted to KHSAA.

On or before January 9, 2015, the school is to submit to KHSAA a written designation of the locker room space assigned to each school sponsored team.

(Medical and Training Facilities and Services)

On or before January 9, 2015, the school is to submit to KHSAA a written usage schedule for the weight training facility. This document is to show equitable female access to the facility and is to be signed by the athletic director and the head coaches of all school sponsored teams. This document is also to be posted at the facility. A picture of this posted document is to be submitted to KHSAA with the schedule by January 9, 2015. This schedule is to become part of the Title IX file and documentation that this task has been completed is to be part of the April 30, 2015 Title IX Improvement Plan (T-60) submitted to KHSAA.

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

(Travel and Per Diem) On or before January 9, 2015, the school is to submit to KHSAA written guidelines for equitable benefits within this category. These guidelines are to address the mode of transportation and provision of meals and lodging for student athletes.

(Publicity) On or before January 9, 2015, the school is to submit to KHSAA a T-35 form for school year 2013-14 (document will show expenditures for 2012-13) which has complete and correct expenditures for all teams in the category of Awards.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

The deficiency designated in the November 20, 2006 school visit report in the benefit category of *Support Services* appears to have been addressed by the elimination of athletic booster clubs and documentation on T-65 forms for 2011-12 and 2012-13 showing athletic spending within generally accepted parameters for the provision of parity. When the school re-submits the T-35 form for 2013-14, further documentation will be available for this category.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Tommy West, 300 Helton St., Williamstown, KY 41097
(859) 824-4421

District Level Title IX Coordinator: Sally Skinner, 300 Helton St., Williamstown, KY 41097
(859) 824-7144

Name	Title	Telephone
Sarah Hicks	Student Athlete	(859) 824-4421
Derek Cummins	Student Athlete	(859) 824-4421
Gary W. Lawson	KHSAA	(502) 545-3393
Kasey A. Mason	Basketball Coach	(859) 824-4421
Wesley Staff	Volleyball Coach	(859) 824-4421
Brandy Feagan	Principal	(859) 824-4421
Sheila Whaley	Parent	(859) 824-4421
Katie McLafferty	Softball Coach	(859) 824-4421 x- 238
Caryn Scheiding	Counselor	(859) 824-4421
Tommy West	Athletic Director	(859) 824-4421

10. Comments

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