

## MEMORANDUM

TO: KHSAA Member School Superintendents, Principals, and Athletic Directors

FROM: Brigid L. DeVries, Commissioner  
Larry Boucher, Executive Assistant Commissioner

DATE: July 14, 2004

RE: 2004 Title IX Forms Submission

School	Newport Central Catholic High School	Reviewed by	Gordon Bocock
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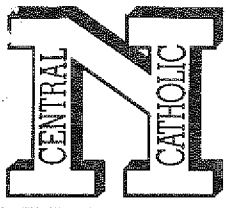
The following is a status report regarding the required 2003 - 2004 Title IX submission of forms due in to the KHSAA office by April 15, 2004. Appropriate audit personnel have reviewed these forms and the following is a summary of this review.

### I. Checklist of Forms properly submitted in a satisfactory manner:

✓	GE 19 (Annual Verification)	✓	T-36 (Budget Expenses)
✓	T-1 (Summary Program Chart 1)	✓	T-41 (Checklist - Overall Interscholastic Program)
✓	T-2 (Summary Program Chart 2)	✓	T-60 (Corrective Action Plan)
✓	T-3 (Summary Program Chart 3)	✓	T-63 (Interscholastic Survey Results))
✓	T-4 (Summary Program Chart 4)	✓	T-68 (Five Year Summary)
✓	T-35 (Budget Expenses)		

### II. Status

A.		2003 - 2004 Forms are satisfactory and no further information or action is necessary at this time.
B.		Errors have been noted with respect to the following forms:
C.		The following forms were omitted and must be submitted by school representatives:
D.	✓	<p>Other Recommendation and Comments:</p> <ul style="list-style-type: none"> <li>It is recommended that your Gender Equity Review Committee meet at least once during the fall sports season, once during the winter sports season and once during the spring sports season.</li> <li>Forms T-35 &amp; T-36 are incomplete without written documentation to explain the reason for all of the blanks, especially in the area of travel. "Somebody" is providing transportation, buying gas, etc. This documentation must also explain the \$400 more a baseball coach is receiving over a softball coach, when all other "like sports" are equal. This documented information should be returned to the KHSAA no later than <b>August 2, 2004</b>.</li> <li>Sixty-six percent (66%) of your money was spent on boys when only 53% of your total participation was boys. No later than <b>August 2, 2004</b>, present documentation as to why there is such a difference in boys/girls money spent as compared to percentage of participation.</li> <li>On Form T-41, you have indicated that the boys' program has an advantage in equipment and supplies as well as in coaching. When you do have these advantages, you should be reflecting this on your Corrective Action Plan (Form T-60) the steps you plan to take to correct these issues. Your Corrective Action Plan does not reflect this; therefore, a new Form T-60 must be submitted no later than <b>August 2, 2004</b>.</li> <li>The KHSAA recommends that your 8<sup>th</sup> graders be included in the Student Interest Survey.</li> </ul>



NEWPORT CENTRAL CATHOLIC  
ATHLETIC DEPARTMENT

Ron Dawn, Athletic Director

13 Carothers Road  
Newport, Kentucky 41071  
859-655-3353, Ext. 26

THE REASON FOR THE DIFFERENCE IN MONEY  
SPENT ON BOYS AND GIRLS IS BECAUSE THE  
EQUIPMENT IN FOOTBALL IS SO EXPENSIVE.

*Ron Dawn*

SCHOOL NAME

2003-2004

TITLE IX

Newport Central Catholic

CORRECTIVE ACTION PLAN

To complete this form, indicate the intended area which needs corrective action, the suggested change and time table for implementation. You may copy this form as needed. Please attach corrective action plans along with audit forms and submit by April 15, 2004.

ITEM FOR CORRECTION	SUGGESTED CHANGE	TIME TABLE FOR CORRECTIVE ACTION
Soccer Field Practice Facility	Develop a new soccer practice facility for both boys & girls.	By August 2004
JALAXY DIFFERENCE IN BASEBALL AND SOFTBALL	NEXT YEAR WE WILL ADD ANOTHER ASOT. COACH IN SOFTBALL	MAY 2005

- For all areas currently identified as items for correction, an intended corrective action explanation is needed.  
THIS FORM SHALL BE TYPED.

Principal's Signature: B. V. Allen

Date: 4/5/04

2003-2004

KHSAA  
Form T36  
REV. 8/03

**BUDGETED AND ACTUAL EXPENDITURES - PROGRAM COMPARISON CHART 2**  
**TO INCLUDE BOOSTER CLUB FUNDING**

Teams	equipment and supplies		travel		awards		coaches' salaries (to include supplemental and extended employment)		facilities improvements		publications (if sport-specific)	
	B	E	B	E	B	E	B	E	B	E	B	E
G track		150.50		508.40		145.18		1500.00				
B track		104.70		140.00		231.60		1500.00				
G tennis		228.46		200.00		75.20		750.00				
B tennis		139.90		100.00		26.85		750.00				
G volleyball		758.14		250.00		155.65		3000.00				
B wrestling												
G (list sport)												
B (football)		21517.73		500.00		790.25		20200.00				
G (list sport)												
B (list sport)												

1. Budget and expenditures on this 2003-2004 year report due by April 15, 2004, should reflect the total monies budgeted and spent for the entire year of 2002-2003 ending June 30, 2003.

2. "B" is for budgeted dollar amounts and "E" is for actual dollar expenditures.

3. Booster Club Funding/Contributions must be included in the expenditures total.

4. Indicate percentage of total expenditures for each gender: Total Expenditures \$97,462.38 % for boys 66 % % for girls 34%

Principal's Signature: *Seetha* Date: *4/15/04*

2003-2004

**BUDGETED AND ACTUAL EXPENDITURES - PROGRAM COMPARISON CHART**  
**TO INCLUDE BOOSTER CLUB FUNDING**

	equipment and supplies		travel		awards		coaches' salaries (to include supplemental and extended employment)		facilities improvements		publications (if sport-specific)	
	B	E	B	E	B	E	B	E	B	E	B	E
G basketball		1,288.15		8,296.84		428.40		6,500.00				
B basketball		999.52		1,494.40		207.12		6,500.00				
G softball		305.45		172.49		230.35		1,900.00				
B baseball		931.20		150. <sup>00</sup>		241.75		2,300.00				
G cross country		150. <sup>00</sup>		100. <sup>00</sup>		85.40		750.00				
B cross country		120. <sup>00</sup>		100. <sup>00</sup>		85.40		750.00				
G golf		170. <sup>00</sup>		100. <sup>00</sup>		74.35		375.00				
B golf		120. <sup>00</sup>		100. <sup>00</sup>		57.85		375.00				
G soccer		1,338.43		600. <sup>00</sup>		223.50		3,000.00				
B soccer		1,224.90		778.80		375.55		3,000.00				
G swimming												
B swimming												

1. Budget and expenditures on this 2003-2004 year report due by April 15, 2004, should reflect the total monies budgeted and spent for the entire year of 2002-2003 ending June 30, 2003.

2. "B" is for budgeted dollar amounts and "E" is for actual dollar expenditures.

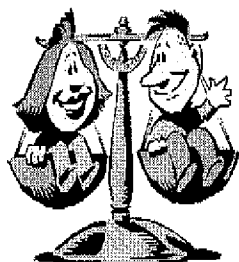
3. Booster Club Funding/Contributions must be included in the expenditures total.

4. Indicate percentage of total expenditures for each gender: Total Expenditures \$

% for boys % for girls

Principal's Signature: Bob Hall

Date: 4/5/04



## TITLE IX FINAL AUDIT REPORT

(For schools visited during the 2002-2003 school year)

School: **Newport Central Catholic**

Reviewed By: **Gordon D. Bocock**

Date of Visit: **Wednesday, February 12, 2003**

Telephone Number of Reviewer: **(606-678-8916)**

### 1. Completed Required Forms

GE-19 Yes ☒ No ☐

Survey Student Interest Form Yes ☒ No ☐

Summary Forms T-1 Through T-41 Yes ☒ No ☐

Corrective Action Plan (Form T-60) Yes ☒ No ☐

### 2. Opportunities Component of Title IX Compliance

Area of Compliance:

(Check One or More)

<b>X</b>	<b>A</b>	Substantial Proportionality
	<b>B</b>	History and Continuing Practice Of Programs Expansion
<b>X</b>	<b>C</b>	Full and Effective Accommodation of Interest and Abilities

A.) If Substantial Proportionality is chosen; does it appear that the school has performed the calculation correctly?

☒ Yes ☐ No

(If No, include in comments section and analysis of what is incorrect in the calculation.)

Comment:

For the 2001-2002 school year, the results of the calculations suggest that the Substantial Proportionality Test is an area of compliance, with the girls' percentage of the total enrollment being 46.2% and the girls' percentage of total participation being 47.47%. This has moved Newport Central Catholic High School within the 3% allowance between total enrollment and total participation. Therefore, at this time, it appears that Newport Central Catholic High School is in compliance on Opportunities Test 1.

B.) If History and Continuing Practice of Program Expansion are chosen; does it appear that the school has performed the calculation correctly?

☐ Yes ☒ No

Comment:

This continues to be an area where the Gender Equity Review Committee at Newport Central Catholic needs to set forth plans that can bring the school into compliance in the History and Continuing Practice of Program Expansion. Positive steps were taken during the 2001-2002 school year but a decline was noticed during the 2002-2003 school year. The Committee needs to make sure that all programs are being counted correctly and devise a plan and a target date for the school to reach compliance on Opportunities Test 2.

C.) If Full and Effective Accommodation of Interest and Abilities is chosen, does it appear that the school provides opportunities in areas of students' interest?

☒ Yes ☐ No

Comment:

It appears that opportunities in the area of student interest are being provided for students at Newport Central Catholic High School. Therefore, the school appears to be in compliance on Test 3.

**3. Has the school properly surveyed its student body to accurately assess the interests and abilities of its students?**

☒ Yes ☐ No

Comment:
Students at Newport Central Catholic High School have been surveyed to ascertain their interests in athletic activities. In the latest survey, students in grades 9-11 responded to the survey. It is suggested that, before the next survey, the Gender Equity Review Committee try to ascertain the majority of the members of the 2003-2004 freshman class and include them in the next survey.



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

<b>Benefit to Students</b>	<b>Satisfactory</b>	<b>Deficient</b>	<b>Comments</b>
<b>Accommodation of Interests and Abilities</b>	<b>X</b>		At the present time, the accommodations of interest and abilities is rated as satisfactory.
<b>Equipment and Supplies</b>	<b>X</b>		At the present time, no deficiencies were found. It is noted that Newport Central Catholic High School does a good job providing quality uniforms to the student athletes. To help assure that the uniforms stay at a high quality level, it is suggested that the Gender Equity Review Committee adopt a uniform replacement policy that would include all of the boys' and girls' athletic teams. This replacement policy should become a part of the school's Title IX File.
<b>Scheduling of Games and Practice Time</b>	<b>X</b>		It is noted that Newport Central Catholic High School is doing a very good job with "prime time" scheduling with the girls having 17 "prime time" games for the 2002 – 2003 school year, which is 63%. A copy of the current policy that the overall region has adopted for girls' "prime time" basketball should be placed in the school's Title IX file and report. Although there appears to be no problem with the scheduling of practice times for boys and girls, a schedule of the gymnasium rotating schedule should be in the school's Title IX file, as well as be posted. Some slight problems were noted with the T-12, T-13 and T-14 forms. The Gender Equity Review Committee is to correct these forms and place the corrected copies in the school's Title IX file.
<b>Travel and Per Diem Allowances</b>	<b>X</b>		It is recommended that the Gender Equity Review Committee establish an equitable policy in writing for student athletes that would cover all of the aspects of travel and place the policy in the school's Title IX file. The Gender Equity Review Committee needs to redo the T-16 form and see that it matches what the coaches stated on their travel and per-diem

			reports.
<b>Coaching</b>	<b>X</b>		Newport Central Catholic may not be in compliance in the area of coaching salaries. At the present time, the coaches' salaries in baseball and softball are out of line. It is suggested that the Gender Equity Review Committee meet with school personnel to establish a school policy in regard to equality in base salaries in each boys' and girls' sport. If school personnel use a percentage of basic salary for percentage increase of coaching stipends, it should be included in the adopted policy (the school's athletic coaches' pay scale) and placed in the school's Title IX file. The Gender Equity Review Committee needs to look at equalization of the assistant coaches in all sports. The Gender Equity Review Committee needs to look at forms T-18, T-19, T-20, T-21, T-22, T-23, T-24 and T-25 to see if corrections are needed, and place the corrected forms in the school's Title IX file.
<b>Locker Rooms, Practice and Competitive Facilities</b>	<b>X</b>		Since all of the dressing rooms are used by all sports, the Gender Equity Review Committee needs to resubmit T-26 forms, one for boys and one for girls, and place them in the school's Title IX file. At the present time, Newport Central Catholic plays very few sports on campus. Several different venues around the Newport and Covington area are used and shared with other schools in the area with a system that seems to be working at the present time.
<b>Medical and Training Facilities and Services</b>	<b>X</b>		The Gender Equity Review Committee needs to redo the T-29, T-30 and T-31 forms and place them in the school's Title IX file. A certified trainer is made available to all the boys and girls at Newport Central Catholic High School. The weight room needs a posted schedule of when it is being used by boys or girls, or a particular sport, to assure that no one is being left out that desires to use the facility.
<b>Publicity</b>	<b>X</b>		The Gender Equity Review Committee has

			<p>some policies that relate to some of the subjects in this particular area, but none appear in the school's Title IX file and report. The Committee should be developing policies for the Athletic Department to ensure equal treatment regarding program production, schedule card production, and media guide production to ensure that other entities such as booster organizations do not affect compliance. The placement of banners/pictures in the gymnasium and commons area of the school should have a policy to ensure that all athletic participants have an equal opportunity for this "prime time" exposure. The school should continue its efforts to clarify the issue of trophy and memorabilia display. This can not be left to the thoughts of individual coaches or participants, but should be a systematic approach that will ensure the equal treatment of all participants. The school appears to have a satisfactory and equitable policy in place regarding cheerleaders for boys' and girls' home basketball games and football games. The school needs to make sure that a policy regarding the selection process and the cheering schedule is in the school's Title IX file.</p>
<b>Support Services</b>	<b>X</b>		<p>It appears that the T-35 and T-36 forms are not complete and do not truly reflect Newport Central Catholic High School funding and expenditures. The Gender Equity Review Committee should submit a report to the KHSAA by April 15, 2003 that shows a closer percentage of expenditures of the boys' and girls' athletics at Newport Central Catholic High School.</p>
<b>Athletic Scholarships**</b>	<b>X</b>		<p>This area does not appear applicable in this situation.</p>
<b>Tutoring**</b>	<b>X</b>		<p>It does not appear to be applicable to this school, nor are there any indications of disparate treatment.</p>
<b>Housing and</b>	<b>X</b>		<p>It does not appear to be applicable to this</p>

<b>Dining Facilities and Services **</b>			school, nor are there any indications of disparate treatment.
<b>Recruitment of Student Athletes**</b>	<b>X</b>		It does not appear to be applicable to this school, nor are there any indications of disparate treatment.

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

The KHSAA Audit Team discussed several items that needed the attention of the Gender Review Equity Committee at Newport Central Catholic High School in regard to policy development, and then making these policies a part of the school's Title IX file. The present Committee and school administration have seen some short-comings in the 1999–2000 original report, and the way that it was presented, and are aware of the changes suggested in the various sections of this report that they need to address for corrective action.

**6. Observed Deficiencies in Overall Girls and Boys Athletics Programs**

This report specifies certain recommendations regarding the development of various written policies and a needed overhaul in the area of the coaches' stipends. In addition, there is a need to complete or redo several forms. It is suggested that the Gender Equity Review Committee add students to the committee. It is also suggested that minutes of all Gender Equity Review Committee meetings become a part of the school's Title IX file.

**7. Facility Recommendations or Concerns**

Although there is not a problem at this time, the Gender Equity Review Committee needs to stay informed of the many venues they offer for opportunities to their athletes. Things can happen every day that could change the opportunities and benefits balance that is currently present at Newport Central Catholic High School.

**8. KHSAA Recommended Action**

- ☐ Notify Office of Civil Rights and Request Federal Investigation of Possible Violations
- ☐ Notify Equity Division and KBE of Potential Title IX Violations
- ☐ Suspension from the Association
- ☐ Prohibition from Post Season Play
- ☐ Probation For

☐ Fine In The Amount of \_\_\_\_\_

☐ None at This Time

☒ School shall submit the following additional information:

As stated in the SUPPORT SERVICES section the T-35 and T-36 forms are to be redone to reflect the true account of expenses by school and/or booster clubs in regard to each column that is listed on the report. This report should be in the KHSAA office by **April 15, 2003**.

**(Selection of Cheerleaders)** On or before **April 15, 2003**, the school is requested to provide information to the KHSAA concerning the manner in which cheerleaders are selected for boys' and girls' teams. If cheerleaders are selected in such a way as to result in arguably better (i.e. "A" team vs. "B" team) cheerleaders performing at boys' events, the school shall also submit a plan under which cheerleaders of equal ability shall perform at an equal number of boys' and girls' games in comparable sports (i.e., boys' varsity and girls' varsity basketball game).

**(Prime Time Contest/Girls' Basketball)** On or before **April 15, 2003**, the school is requested to provide information to the KHSAA concerning the number of "prime time" games scheduled (games to be played on Friday and/or Saturday nights) for its girls' varsity basketball team during the 2001/2002 season. To the extent that a fewer percentage of girls' games are played during prime times (when compared with the percentage of boys' games scheduled for prime times), the school shall advise the KHSAA of action it intends to take to immediately correct the difference.

## 9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

**High School Title IX Coordinator:** Ron Dawn – 13 Carothers Road, Newport, Kentucky  
41071 (859) 292-0001

**District Level Title IX Coordinator:** Bob Noll – 13 Carothers Road, Newport, Kentucky  
41071 (859) 292-0001

41071

Name	Title	Telephone
Gordon D. Bocock	KHSAA Audit Team	606-678-8916
Gary W. Lawson	KHSAA Audit Team	859-875-3817
Jenny Mertle	Asst. AD and Volleyball	859-292-0001

	<b>Coach</b>	
<b>Amy Bueter</b>	<b>School Board Extra Circular Chair</b>	<b>859-781-4950</b>
<b>Jeff Schulken</b>	<b>Baseball and Golf Coach</b>	<b>859-292-0001</b>
<b>Bob Noll</b>	<b>School Principal</b>	<b>859-212-0001</b>
<b>Rob Detzel</b>	<b>Boys Basketball Coach</b>	<b>859-261-6874</b>
<b>Christie McDonald</b>	<b>Girls Basketball Coach</b>	<b>859-781-3314</b>
<b>Kim Ziegler</b>	<b>Parent</b>	<b>859-491-1353</b>
<b>Ron Dawn</b>	<b>School Athletic Director</b>	<b>859-441-2114</b>

**10. Comments:**

It is the opinion of this KHSAA Audit Team that the Gender Equity Review Committee at Newport Central Catholic High School has the makings of an excellent working team once they have the student members in place. Overall, the interscholastic athletic program clearly has the support of the school and the school community. The KHSAA Audit Team thanks the Committee and the administration for the warm welcome and we encourage the Gender Equity Review Committee to design the policies that we have discussed and that were put forth in this report in an effort to strengthen the governing of the Newport Central Catholic High School Athletic Department.