



**KHSAA TITLE IX RE-VISIT
FIELD VISIT REPORT**

KHSAA Form T76
Rev..11/16

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|--------------------|-------------------------------------|
| School: | Covington Holy Cross |
| Prepared By: | Gary W. Lawson |
| Date of Re-Visit: | October 17, 2019 |
| Staff Reviewed By: | Darren Bilberry, Asst. Commissioner |
| School Year: | 2019-2020 |

ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:

| OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT) | Completed |
|--|---------------------|
| Test One – Substantial Proportionality | |
| Test Two – History of Continuing Practice of Program Expansion | |
| Test Three – Full and Effective Accommodation of Interest and Abilities | Satisfactory |
| Analysis Form Review | X |

ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES: Both the October 19, 2005 and the December 19, 2013 Title IX school visit reports rated the *Accommodations of Student Interest and Abilities –Satisfactory*. The 2005 report stated that the data indicated that the standard established by Test 1 was being met. The 2013 report documented that the information and rosters provided showed that compliance with the standards established by both Tests 1 and 3 was likely. A review of the annual Title IX reports for the past two years shows that it is likely that the standard of Test 3 is being met at this time. The T-3 and T-63 forms in the 2018-19 annual report provide strong evidence that the students' current athletic interests are being accommodated. The school offers 17 total team opportunities for girls and 18 total team opportunities for boys. The T-63 form in the 2017-18 annual Title IX report shows that a 102.7% completion rate was received on the most recent student athletic interest survey. **SCHOOL OFFICIALS WERE REMINDED THAT A COMPLETION RATE OF MORE THAN 100% IS NOT POSSIBLE.** During the most recent visit, the school's Title IX file was examined. It was found to contain all the previous Title IX school visit reports, a copy of the 2018-19 annual Title IX report, a principal-approved salary schedule for coaches, a list of the current members of the Gender Equity Review Committee, recent game schedules for all varsity teams, a school-generated athletic handbook for coaches, a school-generated athletic handbook for student athletes, a copy of the constitution and by-laws for the booster club, written facility usage schedules for the gym and the weight training room, regulations addressing equitable recognition of athletic participation and accomplishments, (see *Publicity* and *KHSAA Recommended Action*), a written designation of the locker room and athletic equipment storage space assigned each team (see *Locker Rooms, Practice, and Competitive Facilities* and *KHSAA Recommended Action*), minutes for Gender Equity Review Committee meetings held during the past three years, a uniform review, rotation, and/or replacement plan (see *Equipment and Supplies*), and guidelines addressing the equitable provision of travel and meals for student athletes (see *Travel and Per Diem Allowances* and *KHSAA Recommended Action*). School officials were commended for the development and maintenance of a comprehensive and well-organized Title IX file.

BENEFITS REVIEW

| BENEFIT | Satisfactory | Deficient |
|-----------------------------------|--------------|-------------------|
| EQUIPMENT AND SUPPLIES | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Uniform review / replacement plan | X | |
| Status of uniforms and equipment | X | |
| Equity of spending | X | |

BENEFITS REVIEW- EQUIPMENT AND SUPPLIES: The 2005 Title IX school visit report rated this benefit category *Deficient*. This rating was based on evidence that the baseball team received significantly more equipment and supplies than did the softball team. The 2013 school report rated this benefit category *Satisfactory* stating that the spending issues of 2005 appeared to have been corrected. All the uniforms examined during the most recent visit were of mid-to-high quality and seemed to be supplied in equitable quantities. A uniform review, rotation, and/or replacement plan showed all school teams were on a three-year cycle except football (5-year cycle), girls and boys tennis, boys and girls golf, and boys and girls swimming which are all replaced annually. UPON RECEIPT OF THIS REPORT, THOSE TEAMS HAVING UNIFORMS REPLACED ANNUALLY ARE TO BE LISTED ON ALL COPIES OF THE REPLACEMENT PLAN IN THE TITLE IX FILE. The 2017-18 and 2018-19 annual Title IX reports show the school was spending \$63 per female athlete and \$73 per male athlete for equipment and supplies.

| BENEFIT | Satisfactory | Deficient |
|--|--------------|-------------------|
| SCHEDULING OF GAMES AND PRACTICE TIMES | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Like sports scheduling | X | |
| Scheduling of shared practice facilities | X | |
| Optimal playing times | X | |

BENEFITS REVIEW- SCHEDULING OF GAMES AND PRACTICE TIMES: The 2005 and 2013 Title IX school visit reports rated this benefit category *Satisfactory*. Information gathered during the most recent visit indicated that the number of competitive events scheduled for teams of "like" sports was comparable. School officials and members of the GERC were requested to closely monitor the number of softball games actually played compared to those played by baseball. The school currently has two venues that are shared per gender for practice. They are the gym and the weight training room. A usage schedule for both of these facilities showing equitable female access was available during the most recent visit. Interviews with coaches and student athletes confirmed that equitable access was being provided. School officials were encouraged to continue to emphasize equity in regard to scheduling competitive events during the most opportune playing times.

| BENEFIT | Satisfactory | Deficient |
|---------------------------------|---------------------|--------------------------|
| TRAVEL AND PER DIEM | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Mode of transportation | X | |
| Provision for meals and housing | | X |
| Equity of spending | X | |

BENEFITS REVIEW- TRAVEL AND PER DIEM: The 2005 and 2013 Title IX school visit reports rated this benefit category *Satisfactory*. Regulations found in the Title IX file during the most recent visit showed that school had addressed the provision of parity in regard to mode of transportation and the provision of meals. It should be noted that while buses are used for transporting athletes, but the major mode of transportation is by the participants' parents. The current regulations do not address the provision of parity in regard to lodging. (See *KHSAA Recommended Action*.) The 2017-18 and 2018-19 annual Title IX reports showed the school was spending \$68 per female athlete and \$27 per male athlete for travel and per diem. These expenditures seem to favor female participants.

| BENEFIT | Satisfactory | Deficient |
|------------------------------|---------------------|--------------------------|
| COACHING | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Compensation | X | |
| Accessibility | X | |
| Competence | X | |

BENEFITS REVIEW- COACHING: The 2005 Title IX school visit report rated this benefit category *Deficient* based on a significant disparity in coaching accessibility which favored male participants. The number of baseball coaches greatly exceeded the number of softball coaches for three consecutive years. The 2013 school visit report rated this category *Satisfactory* stating "when reported correctly" the number of coaches provided per team appears equitable. Information gathered during the most recent visit revealed that the athletic director is responsible for evaluation of all head coaches. A written instrument is used for documentation of this process. A review of the school's extra service pay schedule showed parity. The T-35 form in the 2018-19 annual Title IX report shows that the total amounts spent for coaching salaries for teams of "like" sports is relatively comparable. Evidence revealed that the coaching ratio for female athletes is 9.3 participants per coach and the ratio for male was 9.6 per coach. Data provided by the athletic director indicated that 33% (3/9) of the head coaches of girls teams and 33% (3/9) of the head coaches of boys teams are on-campus employees.

| BENEFIT | Satisfactory | Deficient |
|--|---------------------|--------------------------|
| LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Competition and practice venues | X | |
| Dressing areas | | X |
| Equipment storage areas | X | |

BENEFITS REVIEW- LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES: Both the 2005 and 2013 Title IX school visit reports rated this benefit category *Satisfactory*. The tour of facilities during the most recent visit revealed that almost all the practice and competitive venues for athletic teams are off the school campus. The gym is the only on-campus venue. The boys and girls soccer teams and the boys and girls track, and the football team all practice at the Eva G. Farris complex that is one mile from the school. The swim team practices and competes at the Covington Boys and Girls Club that is located one mile from the school. The softball team practices and plays most of its games at Bowan Field about eight miles from the school. The baseball team places and practices at Meinken Park located one mile from the school. All the amenities at the baseball field appear to be superior to those at the softball field. At first glance this situation seems to indicate a deficiency, but there is one mitigating factor. The baseball field is owned by another local high school which means Holy Cross has "access" to this field (for a rental fee) only when that school allows Holy Cross time for practice and playing games. Interviews with student athletes and the athletic director emphasized that the softball team has ownership of their field and get the most opportune playing and practice times while baseball does not. Considering this unique situation, it will not render this benefit category deficient, but school administrators and the GERC are requested to review this situation annually to determine if there are alternatives that would benefit both programs. All school teams except boys and girls tennis (see *KHSAA Recommended Action*) are assigned dressing areas. A review of the dressing areas and the assigned equipment storage areas indicated parity.

| BENEFIT | Satisfactory | Deficient |
|---|---------------------|--------------------------|
| MEDICAL AND TRAINING FACILITIES AND SERVICES | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Weight room location and access | X | |
| Weight room usage schedule | X | |
| Appropriate equipment for female use | X | |
| Athletic Training services | X | |
| Physical Exams | X | |

BENEFITS REVIEW- MEDICAL AND TRAINING FACILITIES AND SERVICES: The 2005 and 2013 Title IX school visit reports rated this benefit category *Satisfactory*. The 2013 report noted that the school's weight training room was undergoing a total renovation at that time. The tour of facilities during the most recent visit revealed that the school had a well-equipped weight training room located near the gym. This facility houses numerous training options that are suitable for females. The usage schedules in the Title IX file and posted at the facility shows equitable female access. Interviews with student athletes and coaches gave strong indication that the usage schedule was being followed. An athletic trainer is available daily on an equitable basis through a contract with St. Elizabeth's Hospital. Physical examinations are also available to any student athlete through St. Elizabeth's for a \$25 fee.

| BENEFIT | Satisfactory | Deficient |
|------------------------------------|---------------------|--------------------------|
| PUBLICITY | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Support group assignments | X | |
| Written regulation for recognition | | X |
| Equity of spending | X | |

BENEFITS REVIEW- PUBLICITY: The 2005 and 2013 Title IX school visit reports rated this benefit category *Satisfactory*. The 2013 report documented the need to develop regulations for athletic recognition to include guidelines for receiving letters and pars and the equitable provision of post season banquets. The school has one varsity cheer squad that is assigned to cheer at all home and away football games. They also cheer at all home boys and girls basketball games. The Title IX file had excellent guidelines addressing the provision of parity in relation to the posting of banners for athletic recognition, awards, and membership in the school's athletic hall of fame. As was true in 2013, there still were no regulations addressing the equitable provision of post season banquets. (See *KHSAA Recommended Action*.) The 2017-18 and 2018-19 annual Title IX reports showed that the school was spending approximately \$8.50 per female athlete and \$10 per male athlete for awards.

| BENEFIT | Satisfactory | Deficient |
|---------------------------------------|---------------------|--------------------------|
| SUPPORT SERVICES | X | |
| INDIVIDUAL COMPONENTS | Acceptable | Needs Improvement |
| Office access | X | |
| Booster Support | X | |
| Overall spending for athletic support | X | |

BENEFITS REVIEW- SUPPORT SERVICES: The 2005 and 2013 Title IX school visit reports rated this benefit category *Satisfactory*. The school has one coaching office which is shared by boys' basketball, girls' basketball, and volleyball. There is one booster club at this time that supports all school teams. This booster club houses its funds inside school accounts. The purchase order process is strictly adhered to for all athletic purchases. An analysis of athletic spending for the past two years shows that in 2017-18 and 2018-19 athletic expenditures were well within generally acceptable parameters for the provision of parity by a football-playing school.

CURRENT DEFICIENCIES

| Observed Deficiencies in Overall Girls and Boys Athletics Programs | Recommended Actions in relation to current deficiencies | Date for Verification of Action to address deficiency |
|--|---|---|
| No deficiencies were designated as a result of the October 17, 2019 Title IX school visit. | | |

RECURRING DEFICIENCIES

| Observed Deficiencies in Overall Girls and Boys Athletics Programs | Recommended Actions in relation to recurring deficiencies | Date for Verification of Action to address deficiency |
|---|---|---|
| No deficiencies were designated as a result of the December 19, 2013 Title IX school visit. | | |

OTHER ACTIONS NECESSITATED BY THIS VISIT

| Action | Due Date |
|---|--------------------------------------|
| (Publicity) The school is to submit to KHSAA written regulations addressing the equitable provision of post season banquets which honor athletic participation and achievement. These regulations are to be added to the Publicity section in the school's Title IX file. | On or before <u>January 10, 2020</u> |
| (Locker Rooms, Practice and Competitive Facilities) School officials are to assign a dressing room for girls' tennis and one for boys' tennis. The area assigned may be shared with other same gender teams, but must be safe and secure and located within reasonable proximity to the teams' practice and playing venue. | On or before <u>January 10, 2020</u> |
| (Travel and Per Diem Allowances) The school is to submit to KHSAA written regulations addressing the equitable provision of lodging for student athletes. These regulations should become a part of the <i>Travel and Per Diem</i> section of the Title IX file. | On or before <u>January 10, 2020</u> |

PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING

| Name | Title |
|----------------|--------------------------------|
| Gary W. Lawson | KHSAA |
| Brittany Black | Varsity Girls Soccer Coach |
| Jill Hunt | Varsity Girls Volleyball Coach |
| Torie Houston | Student Athlete |
| Jackson Neff | Student Athlete |
| Mike Holtz | Principal |
| Anne Julian | Athletic Director |
| Aimee Finke | Booster President |

OTHER GENERAL OBSERVATIONS

Although not part of the current Title IX evaluation, as per request, the school was asked to provide a copy of its Athletic Facility Emergency Medical Plan (KRS 160.445) The plan presented was comprehensive and "team specific". UPON RECEIPT OF THIS REPORT, THIS PLAN IS TO BE MADE "VENUE-SPECIFIC" AS REQUIRED BY THE STATUTE.

As per request, the school was asked for a listing of the locations of all Automated External Defibrillators. It was confirmed that AED's were in the following locations:

- 1-permanent AED in Admissions office
- 2-permanent AED in the gym
- 3-permanent AED at the Eva G. Farris complex
- 4-portable AED carried by the football coach
- 5- portable AED carried by the athletic trainer.

No one from the community attended the Public Comments Session. The school's athletic director was commended for the thorough preparation for the school visit. The meeting was adjourned at 3:30 pm EDT.

Covington Holy Cross

CURRENT DEFICIENCIES

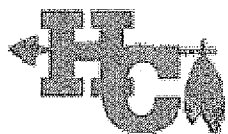
| Observed Deficiencies in Overall Girls and Boys Athletics Programs | Recommended Actions in relation to current deficiencies | Date for Verification of Action to address deficiency |
|--|---|---|
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RECURRING DEFICIENCIES

| Observed Deficiencies in Overall Girls and Boys Athletics Programs | Recommended Actions in relation to recurring deficiencies | Date for Verification of Action to address deficiency |
|---|---|---|
| No deficiencies were designated as a result of the December 19, 2013 Title IX school visit. | | |

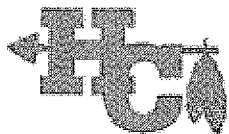
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Team Travel Policy

Holy Cross Athletic Teams will seek accommodations at Hotels that have at least a 3 star rating. The rooms should be accessible only through the inside of the hotel where security is provided. Identifying hotels that provide a FREE breakfast is preferred. All rooms should be available for double occupancy.



End of Season Recognition and Banquets

Holy Cross Athletic Teams are to celebrate their individual season at an Awards Banquet. Each program will be funded by Athletic money for Letterman "numerals" and chinelle letters. In addition a meal diem in the amount of \$8.00 per participant including coaches and support staff will be provided. The award break down is as follows:

Freshman: Each a graduation numeral and sport pin

Sophomore: Each a small HC and sport pin

Junior: Each a large HC and sport pin

Senior: Each a HC insignia and sport pin

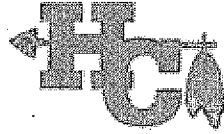
Team Awards:

Freshman Teams 3 individual awards

Junior Varsity Teams: 3 individual awards

Varsity: 5 individual awards plus Indian Award

All awards will be the exact same type. These are on record at Trophy Awards in Wilder KY.



Locker Room Facility

Locker Rooms located in the Monsignor Finn Athletic Center are designated for the boy's and girl's tennis teams.

Boy's will occupy the EAST locker room facility

Girl's will occupy the West locker room facility.

Both these locker rooms are only accessible with key and there are lockers provided to secure items while practicing and playing. All participants may purchase their own LOCK for individual lockers.