



TITLE IX FINAL AUDIT REPORT

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

School: **Holy Cross (Covington) High School**
Reviewed By: **Gordon Bocock**
Date of Visit: **February 5, 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)

X	A	Substantial Proportionality
	B	History and Continuing Practice Of Programs Expansion
X	C	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 45.1% and the girls’ percentage of total participation being 45.3%. This has moved Holy Cross (Covington) High School within the 3% accepted allowance between total enrollment and total participation. Therefore at this time it appears that Holy Cross (Covington) 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:

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 Holy Cross (Covington) High School. At the present time, the school offers a varsity team in each sport in which the KHSAA sponsors a championship.

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

Yes No

Comment:

Students at Holy Cross (Covington) High School have been surveyed to ascertain their interests in athletic activities. In the latest survey, students in grades nine, ten, eleven and twelve 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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		At the present time the accommodations of interest and abilities is rated as satisfactory.
Equipment and Supplies	X		At the present time no deficiencies were found. However, school personnel need to submit the T-5 forms that were missing from the original 1999-2000 Title IX Report. The forms were missing for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball. Once these forms are completed, the Gender Equity Review Committee should check to see if the T-8, T-9 and T-10 forms need to be updated in the school's Title IX file.
Scheduling of Games and Practice Time	X		The school has a policy for the display of banners and a copy should be placed in the school's Title IX file. A copy of the current policy the Region has adopted for girls' "prime time" basketball should be placed in the school's Title IX file. Several T-11 forms were missing from the original 1999-2000 Title IX Report. The forms were missing for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball. Once these forms are completed, the Gender Equity Review Committee should check to see if the T-12, T-13 and T-14 forms need to be updated in the school's Title IX file.
Travel and Per Diem Allowances	X		It is recommended that the Gender Equity Review Committee establish an equitable policy for student athletes that would cover all aspects of travel and place the policy in the

			<p>school's Title IX file. Several T-15 forms were missing from the original 1999-2000 Title IX Report. The forms were missing for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball. Once these forms are completed, the Gender Equity Review Committee should check to see if the T-16 form needs to be updated in the school's Title IX file.</p>
Coaching	X		<p>Holy Cross (Covington) High School may not be in compliance in the area of coaching salaries. At the present time, the coaches' salaries in baseball and softball appear to be greatly different. The Gender Equity Review Committee needs to get with school personnel to establish a school policy in regard to equality in base salaries in each boys' and girls' comparable sport. If the school personnel coaching stipend policy is a percentage of basic salary it should be included in the adopted policy. Several T-17 forms were missing from the original 1999-2000 Title IX Report. The forms were missing for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball. Once these forms are completed the Gender Equity Review Committee should check to see if the T-18 through T-25 forms need updated in the school's Title IX file.</p>
Locker Rooms, Practice and Competitive Facilities	X		<p>No deficiencies were found in the locker rooms. At the present time, Holy Cross (Covington) High School plays very few sports on campus. Several different venues around the city of Covington are used and shared with other schools in the area. School personnel are working with the city of Covington to build a permanent soccer and football facility that would assist the school with practice and game situations.</p>
Medical and Training Facilities and	X		<p>All indications are that the students are responsible for physical examinations. One boys' coach indicates that this is not the case. Forms also indicate that some medical attention</p>

Services		<p>is given to boys' teams that the girls do not receive. It is suggested that the Gender Equity Review Committee develop a policy that would bring equality to all the boys' and girls' programs. All indications in the school weight room imply that it is used entirely by male athletes. A schedule for all the sports using the weight room facility should be established and posted. Boys and girls should have equal access to this room with appropriate equipment that both can use. Several T-28 forms were missing from the original 1999-2000 Title IX Report. The forms were missing for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball. Once these forms are completed the Gender Equity Review Committee should check to see if the T-29 and T-30 forms need updated in the school's Title IX file.</p>
Publicity	X	<p>At the present time, things appear to be satisfactory; however, the Corrective Action Plan for the past three years states a need to correct some cheerleading issues. At this time, the school is suggested 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, school personnel 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 games). Several T-32 forms were missing from the original 1999-2000 Title IX Report. The forms were missing for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball. Once these forms are completed the Gender Equity Review Committee should check to see if the T-33 form needs updated in the school's Title IX file. At the present time, sport schedules are</p>

			printed but not for all sports. It is suggested that the Gender Equity Review Committee develop a policy that would represent all boys and girls in all sports in regard to printed schedules (fall, winter and spring).
Support Services	X		The 2001-2002 Budget Report, T-35, needs to be re-submitted to show the actual expenses in football as it did in the other areas. School personnel were reminded to show travel expenses, awards, facility expenses and salaries with the budget report. It is suggested that the Gender Equity Review Committee develop a policy that shows Booster Club control and place in the school's Title IX file. Several T-34 forms were missing from the original 1999-2000 Title IX Report. The forms missing were for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
Athletic Scholarships**			N/A
Tutoring**			N/A
Housing and Dining Facilities and Services **			N/A
Recruitment of Student Athletes**			N/A

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

The KHSAA Audit Team expressed concern that the Corrective Action Plan for Holy Cross (Covington) High School for the past two years has been a carbon copy of the 1999-2000 report. School personnel recognizes the need to correct some situations but has shown no documented proof that corrective action has taken place. It is suggested that the Gender Equity Review Committee actually look at the corrective action and document the improvements that have taken place as well as to show the steps that will lead to other corrective actions.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No deficiencies were found, but some areas need constant attention in the very near future. (Weight room, coaching salaries, expense reports in all areas)

7. Facility Recommendations or Concerns

Although it is not deficient at this time, the Gender Equity Review Committee needs to give some attention to conditions in the weight room to make it more appealing to female athletes.

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:

(Selection of Cheerleaders) On or before **May 1, 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 sport (i.e., boys' varsity and girls' varsity basketball game).

(Prime Time Contest/Girls' Basketball) On or before **May 1, 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 2002/2003 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 correct the situation for the 2003-2004 season.

(Coaching Stipends) On or before **May 1, 2003**, the school is requested to provide information to the KHSAA concerning the differences in the boys' baseball and girls' softball salaries. If school personnel use a percentage of basic salary for % increases, it should be included with a policy stating such.

(Budget Report) On or before **May 1, 2003**, school personnel are requested to provide information to the KHSAA concerning the actual football expenses on the T-35 form.

(Missing Title IX Forms) On or before **May 1, 2003** the school is requested to provide to the KHSAA the following forms that were missing from the school's original Title IX report in 1999-2000.

- T-5's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
- T-11's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
- T-15's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
- T-17's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
- T-28's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
- T-32's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.
- T-34's for baseball, girls' golf, boys' track, girls' track, boys' swimming, girls' swimming and girls' volleyball.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

**High School Title IX Coordinator: Cory Miller, 32 Lexington Drive, Covington, KY
859-342-5204**

**District Level Title IX Coordinator: Cory Miller, 32 Lexington Drive, Covington, KY
859-342-5204**

Name	Title	Telephone
Larry Boucher	KHSAA Audit Team	859-299-5472
Gordon Boccock	KHSAA Audit Team	606-678-8916
Gayle Trame	Cheerleading Coach	859-431-1335
Jodi Fahey	Teacher	859-544-0691
Mike Koch	Coach/Teacher	859-372-0613
Cory Miller	Athletic Director	859-342-5205

10. Comments:

It is the opinion of the KHSAA Audit Team that the Gender Equity Review Committee at Holy Cross (Covington) High School needs varied membership of the committee as is suggested by the KHSAA Gender Equity Review Committee recommendations. Overall, the interscholastic athletic program clearly has the support of the school community. The KHSAA Audit Team encourages the Gender Equity Review Committee to design a number of policies, as put forth in this report, to more fully comply with Title IX guidelines and policies.