

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

(For schools re-visited during the 2005-2006 school year)

School: **Holy Cross (Covington) High School**
Reviewed By: **Gordon D. Bocoek**
Date of Re-Visit: **October 19, 2005**
Telephone Number of Reviewer: **(859) 299-5472**

1. Completed Required Forms

- Verification of Forms (Form GE-50) Yes No
- Participation Opportunities Summary Chart (Form T-70) Yes No
- Benefits Summary Charts (Forms T-71 & T-72) Yes No
- Benefits Publicity (Form T-73) Yes No
- Corrective Action Plan Summary Charts (Form T-74) 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
	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:

After looking at the figures from the first six years of Title IX, the results of the calculations suggest that the Substantial Proportionality Test is an area of compliance, as it appears that the last five years Holy Cross (Covington) High School passed the T-1 Test.

- 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:

- 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:

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

Comments:

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 recommended that, before the next survey, the Gender Equity Review Committee try to ascertain where the majority of incoming Freshmen are coming from and include them in their next survey. It is not recommended that you continue to survey the senior class.

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. The Gender Equity Review Committee needs to be alert to the changing needs and interests of their student body as it can change from time to time.
Equipment and Supplies		X	<p>Everything in equipment and supplies appears to be in compliance except for baseball/softball. During the 2003-2004 school year, Holy Cross (Covington) spent \$6,242 on baseball Equipment and Supplies as compared to \$2,012 for softball. During the 2004-2005 school year, the baseball team received \$9,110 for Equipment and Supplies while softball received \$1,800. For a two year period, the baseball program received \$11,534 more for Equipment and Supplies than softball. During the 2004-2005 school year, Holy Cross (Covington) spent \$39,450 for boys' teams Equipment and Supplies as compared to \$31,050 for girls' teams. Also note that these figures do not include any football expenses for Equipment and Supplies. The \$5,000 difference in boys' and girls' basketball spending is also an area of concern.</p> <p>The Gender Equity Review Committee needs to address these issues and develop steps they plan to use to bring this area of Equipment and Supplies into greater compliance.</p>

<p>Scheduling of Games and Practice Time</p>	<p>X</p>	<p>At the present time, the Prime Date issue is under control as 40% of the girls' games are being played on prime dates. It is recommended that the Gender Equity Review Committee keep a constant eye on this compliance.</p> <p>A schedule of practice time is in place for basketball and a copy needs to be placed in the school's permanent Title IX file. Submit to the KHSAA, no later than March 1, 2006 a copy of your school's established written policies regarding the necessary credentials and accomplishments for an athlete or team to be honored with banners, awards or recognition within your school. A copy of this policy must be provided to all head coaches and a copy must be kept in the school's Master Title IX File.</p>
<p>Travel and Per Diem Allowances</p>	<p>X</p>	<p>Submit to the KHSAA, no later than March 1, 2006 a copy of an adopted school wide policy that addresses equitable travel and per diem allowances for both male and female sports. A copy of this policy must be distributed to all head coaches and a copy must be maintained in your school's Master Title IX File.</p>

<p>Coaching</p>		<p>X</p>	<p>Holy Cross is in good shape with coaching salaries in every area but in the like-sports of Baseball/Softball.</p> <p>1. Number of coaches</p> <table data-bbox="852 388 1438 556"> <thead> <tr> <th></th> <th style="text-align: center;"><u>Softball</u></th> <th style="text-align: center;"><u>Baseball</u></th> </tr> </thead> <tbody> <tr> <td>2003-2004</td> <td style="text-align: center;">3</td> <td style="text-align: center;">8</td> </tr> <tr> <td>2004-2005</td> <td style="text-align: center;">2</td> <td style="text-align: center;">8</td> </tr> <tr> <td>2005-2006</td> <td style="text-align: center;">2</td> <td style="text-align: center;">7</td> </tr> </tbody> </table> <p>In girls' Softball the Head Coach and Assistant Coach work with the Varsity and Junior Varsity with one salary each. In Baseball there are programs for Freshmen, Junior Varsity and Varsity. The Freshmen boys have one paid coach and one volunteer coach. The Junior Varsity boys have a paid head coach and 2 assistant paid coaches. The Varsity program has one paid head coach and two paid assistants until this year when they are listed to have only one paid assistant. The salary scale for the programs has shown a big difference over the past three years.</p> <p>Girls' Softball has two coaches paid one salary to coach the entire girls' program. Boys' Baseball has six or seven paid coaches and some volunteers to coach their program.</p> <p>While the KHSAA is currently working with Holy Cross to eliminate some of these inequities, the Gender Equity Committee needs to look at this inequity and to immediately set forth the corrective action that will bring the baseball/softball issues into compliance.</p>		<u>Softball</u>	<u>Baseball</u>	2003-2004	3	8	2004-2005	2	8	2005-2006	2	7
	<u>Softball</u>	<u>Baseball</u>													
2003-2004	3	8													
2004-2005	2	8													
2005-2006	2	7													

<p>Locker Rooms, Practice and Competitive Facilities</p>	<p>X</p>	<p>The locker room situation at Holy Cross (Covington) is basically only one male and one female dressing room, and they are seldom used. Basketball teams and football teams use the rooms provided while the other sports basically do not use them, even though they are there and are provided. The locker rooms are small and old but they are more than adequate. Holy Cross (Covington) has improved the practice and competitive facilities situation greatly since the last audit. A new agreement with the City of Covington has made football practice and game situations better with a facility for concessions and dressing available. Junior Varsity games are played at the facility, while the Varsity plays games at Holmes High School. A new soccer complex is a fantastic facility and puts them well ahead of most soccer teams in the area. The soccer field is surrounded by a beautiful 400-meter running track. The track facility has yet to be completed with no lines painted on the track or no field event venues yet in place. It has the potential to be the best track and field complex in Northern Kentucky. The softball team has been moved several miles closer to the school and makes travel safer and easier for these athletes and coaches. Holy Cross (Covington) has made tremendous strides with the improvements to the facilities, and they are to be commended.</p>
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<p>Medical and Training Facilities and Services</p>	<p>X</p>		<p>All indications are that the students are responsible for physical examination. It is recommended that the Gender Equity Review Committee establish a policy that would appear in the Athletic Handbook and in the Title IX policy that would allow parents to know this policy in advance.</p> <p>In regard to the school's weight room it is recommended that the Gender Equity Review Committee look at ways to make this room more female-friendly, such as weights and/or equipment that is more female-friendly. Change the décor that would show that it is positive for boys and girls alike to gain benefits from the room and the equipment therein.</p> <p>Submit to the KHSAA, no later than March 1, 2006 a copy of a documented weight room usage schedule for both male and female athletes at your high school. This schedule must be provided to all head coaches, must be posted in view in your weight room, and maintained in your school's Master Title IX File.</p>
<p>Publicity</p>	<p>X</p>		<p>It appears that Holy Cross (Covington) is in compliance in this area.</p>
<p>Support Services</p>	<p>X</p>		<p>In regard to Booster Clubs it appears that Holy Cross (Covington) is in total control. One Booster Club supports the entire athletic department and each sport equally. The support the school gives the athletes is an area at which the Gender Equity Review Committee may need to look and address in the future. This area is border-line now and may soon need attention. According to the 2005 Athletic Budget Report the boys' athletic teams spent \$88,898 while the girls' athletic teams spent \$43,790. When broken down even more, it averages \$348 per male athlete and \$189 per female athlete. Some differences that need to be looked at and addressed.</p>
<p>Athletic Scholarships</p>			<p>N/A</p>
<p>Tutoring</p>			<p>N/A</p>

Housing and Dining Facilities and Services			N/A
Recruitment of Student Athletes			N/A

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

Holy Cross (Covington) High School has made some tremendous improvements to the facilities at which their athletes practice and compete, but they do not give themselves credit with any documentation to support when these improvements took place. The school needs to document these improvements in all areas and place said documentation in the school's permanent Title IX File.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

- The issue with the number of coaches in baseball and softball is an area where the boys' baseball program has a much better opportunity for young men to develop their baseball talents, not only because of the three levels of play, but also the seven or eight coaches actually working with the young men as compared to two coaches working with the entire softball team.
- The issue of coaches' salaries. The Head Softball and Baseball Coach receive the same salary and the Varsity Assistant Softball and Baseball Coach receive the same salary. The Junior Varsity Coaches for Softball are the same coaches that coach the varsity softball team and they receive no additional stipend while the junior varsity baseball team and freshman baseball teams have separate coaches that receive a stipend for their efforts. At times, the junior varsity and freshman baseball teams also have volunteers that put the issue more out of balance.
- Over a two year period the baseball team spent \$11,534 more on Equipment and Supplies, as compared to softball, which appears to be out of line for like sports.

7. KHSAA Recommended Action in relation to new deficiencies

The Holy Cross High School in Covington needs to take an in depth look at the issues dealing with Baseball and Softball. The Gender Equity Review Committee at the school does not see baseball and softball as like sports but in the eyes of Title IX they are very much like sports. Not having a Freshman Softball Team is not the issue, but the major issue is the differences in the Varsity and Junior Varsity programs, with the number of coaches providing opportunities for athletes to improve, as compared to two coaches expected to do everything for softball. The issues of salaries spent for boys' baseball as compared to girls' softball, again looking at the varsity and junior varsity level is a red flag issue. In addition, so is equipment and supplies and monies spent in regard to boys and girls, especially baseball and softball.

The entire Gender Equity Review Committee needs to establish, with the School Administration, steps that they will plan to take to make the area of Equipment and Supplies and Coaching Salaries compliant before the start of the 2006 Baseball/Softball season begins. The intended Corrective Action the school sets forth to address these issues needs to be completed and sent to the KHSAA Office by **March 1, 2006**.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

Submit to the KHSAA, no later than **March 1, 2006** a copy of a documented weight room usage schedule for both male and female athletes at your high school. This schedule must be provided to all head coaches, must be posted in view in your weight room, and maintained in your school's Master Title IX File.

Submit to the KHSAA, no later than **March 1, 2006** a copy of your school's established written policies regarding the necessary credentials and accomplishments for an athlete or team to be honored with banners, awards or recognition within your school. A copy of this policy must be provided to all head coaches and a copy must be kept in the school's Master Title IX File.

Submit to the KHSAA, no later than **March 1, 2006** a copy of an adopted school wide policy that addresses equitable travel and per diem allowances for both male and female sports. A copy of this policy must be distributed to all head coaches and a copy must be maintained in your school's Master Title IX File.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Cory Miller

District Level Title IX Coordinator: Cory Miller

Name	Title	Telephone
Jennifer Stropko	Teacher	859-485-2134
Clay Eifert	Principal	859-431-1335
Anne Julian	Academic Counselor	859-431-1335
Pat Lenitlaw	School Board	859-291-7565
Erik Goetz	Boys Basketball Coach	859-431-1335
Rick Bibbins	Parent/Booster President	859-630-6300
Debbie Bippins	Parent	859-356-5444
Terry Bray	Girls Soccer Coach	859-635-4592
Cory Miller	Athletic Director/ Title IX	859-431-1335
Jeffrey West	Male Student Athlete	859-342-9971
Brooke Landry	Female Student Athlete	859-426-5030
Gordon Bocock	KHSAA Audit Team	859-299-5472
Gary Lawson	KHSAA Audit Team	859-299-5472

10. Comments

In the opinion of the KHSAA Audit Team, a lot of improvements have been made in certain areas. The last time the Gender Equity Review Committee met with the KHSAA Audit Team only 4 members of the Committee attended and discussed the issues. From the names listed above, the Committee now has much better representation. The addition of parents and students is a positive plus. This Committee has some policies that they need to look at and establish and then make sure that they are put in the school's permanent Title IX File. Overall, it's obvious that the Holy Cross (Covington) Athletic program has the full support of the school and community. The only thing that keeps Holy Cross (Covington) from being a top notch program is the glaring differences in the Baseball and Softball programs. Once these issues are addressed and corrected, Holy Cross (Covington) will have one on the top overall programs in Northern Kentucky.

Kentucky High School Athletic Association

September 19, 2005

Mr. Brian Shumate, Principal
Iroquois High School
4615 Taylor Blvd.
Louisville, KY 40215

Dear Mr. Shumate:

Approximately six times each year, the Kentucky High School Athletic Association appears before the Kentucky Board of Education. One aspect of those visits is a required update on the status of the KHSAA's efforts to accomplish gender equity in our member schools athletic programs.

At our most recent appearance, there was dissatisfaction expressed by the KBE over the KHSAA's efforts to ensure Title IX compliance among some of its member schools. One such school cited in our required report to the KBE is Iroquois High School. This concern stems from: (1) a lack of cooperation on the necessary improvements to the girl's basketball locker room; and (2) a lack of cooperation with regard to timely reporting of such progress involving Iroquois High School's compliance efforts.

As a result, the following directives are issued by the KHSAA:

A). In our initial Title IX on-site visit of your school, we cited a deficiency that the girl's basketball locker room needed to be upgraded to match the quality of the boy's basketball locker room. In a subsequent on-site revisit, we not only found that the girl's basketball locker room had not been upgraded, we found that further positive enhancements had been made to the boy's locker room creating an even greater disparity.

Therefore, until further notified to the contrary by the KHSAA, Iroquois High School girl's basketball team/program will move in its entirety to occupy the renovated boy's basketball locker room. And, the boy's basketball team will move its operation in its entirety to occupy what has been identified in our visits as the girl's basketball locker room. The boy's basketball team may not at any time occupy what has been thought of previously as the boy's basketball locker room. If, in the procedures we establish for us to monitor compliance with this directive, we discover any effort by school affiliated personnel, at any time, to circumvent or not act in good faith with this directive, it will result in the reduction to a total of twelve basketball games per season allowed for your boy's basketball team. Contracts that might need to be broken as a result of this potential penalty would necessitate a forfeiture fee.

Iroquois High School – Title IX
Page 2 of 2
September 19, 2005

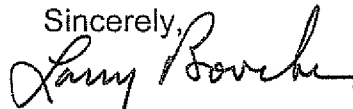
B). Meet with your school's Gender Equity Committee in October, January and April of the years of 2005-06, 2006-07 and 2007-08. Provide to the KHSAA, not later than one week after the meeting, minutes of the Gender Equity Committee Meeting detailing the date of the meeting, who attended the meeting (the meeting attendees must include the Principal, Athletic Director, one male and one female head coach, the school's guidance counselor, two or more parents, and one male and one female student athlete.....and a quorum of members must be present at each meeting), the time the meeting was called to order and adjourned, and those detailed athletic/Title IX discussions that involved corrective actions that might have been identified by this Committee or other interested parties.

Your school is to identify the Committee Chair within these October minutes each year. We will expect the Chair, as well as the Iroquois High School Principal, to provide timely responses to any compliance information we might seek.

Mr. Shumate, we are now in our seventh year of Title IX compliance efforts. I urge you to consider the seriousness of the fact that Title IX deficiencies are still a concern at Iroquois High School. Please, let's work together to immediately eliminate all of these issues for your outstanding school and put these concerns to rest. Anything less will result in unwanted, more severe penalties against your entire athletic program.

C: Commissioner DeVries
Supt. Stephen Daeschner
AD Darin Long

Sincerely,



Larry Boucher
Assistant Commissioner

Kentucky High School Athletic Association

September 19, 2005

Mr. Derrick McKnight, Principal
Breathitt County High School
2307 Bobcat Lane
Jackson, KY 41339

Dear Mr. McKnight:

Approximately six times each year, the Kentucky High School Athletic Association appears before the Kentucky Board of Education. One aspect of those visits is a required update on the status of the KHSAA's efforts to accomplish gender equity in our member schools athletic programs.

At our most recent appearance, there was dissatisfaction expressed by the KBE over the Title IX accomplishments of Breathitt County High School. They were most concerned about: (1) the cramped and overlapping usage of athletic facilities for girl's athletic programs; (2) the lack of established policies for the purpose of monitoring standards and compliance; and (3) the significant and ongoing disparity in the amount of annual funding provided for boy's athletics as compared to funding for girl's athletics.

In an effort to assist your school toward compliance goals, I wish to set a date for a personal visit to your school, a tour of all of your athletic facilities and a discussion of goals and objectives with your school's Gender Equity Committee. I will be in your area on Wednesday, October 19, 2005 and would like to meet on that day. I want to tour the facilities at approximately 1:30 p.m. Following that tour I want to meet with your Gender Equity Committee at approximately 3:30 p.m. Those Committee members present at the meeting should include two parents, a female basketball player, a Breathitt County Board of Education member, a female volleyball player, the Athletic Director, the head volleyball and boys' basketball coaches, and any other members you chose to invite. If these members are not present, we will reschedule the portion of our visit with the Gender Equity Committee. Every effort should be made to ensure their attendance. Hopefully, the visit should conclude no later than 5:00 p.m. or earlier.

We are now in our seventh year of Title IX compliance efforts. I urge you to consider the seriousness of the fact that Title IX deficiencies are still a concern at Breathitt County High School. Please, let's work together to immediately eliminate all of these issues for your outstanding school and put these issues to rest. Anything less will result in unwanted penalties levied against your football program.

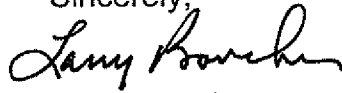
2280 Executive Drive
Lexington, Kentucky 40505
(859) 299-5472 Fax (859) 293-5999

Breathitt County – Title IX
Page 2 of 2
September 19, 2005

I look forward to being with you on October 19th. If I may be of any assistance, please feel free to contact me.

C: Commissioner DeVries
Supt. Ron Eden
AD Mike Holcomb

Sincerely,



Larry Boucher
Assistant Commissioner

Kentucky High School Athletic Association

January 6, 2006

Mr. Brian Shumate, Principal
Iroquois High School
Taylor Blvd.
Louisville, KY

Dear Mr. Shumate:

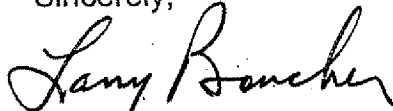
First let me express my appreciation for the hospitality extended to me during my visit to your school on Tuesday, January 3, 2006. I enjoyed the tour of the gymnasium dressing room facilities and the opportunity to watch the boy/girl double-header basketball games. Please express my thanks to your Athletic Director and Assistant Principal, as well.

I want to commend you and your staff on the excellent progress you have made in your recent efforts to upgrade the girl's basketball dressing room facilities. As we know, the inequity between the boy's dressing room facilities and the girl's dressing room facilities was an ongoing issue we had cited in two previous on-site Title IX visits. Once the individual locks are installed on the lockers, the lockers within the girl's dressing room will be identical to those of the boys. In fact, you have taken the extra step of installing three more lockers in the girl's dressing room than in the boy's locker room. In addition, the adjustments to the coach's office will further enhance an exciting place for the female student athletes at Iroquois High School to prepare for their contests. While it was dark and we didn't get to see the upgrades to the softball complex, I trust your comments that the progress on that project is almost complete.

Dr. Shumate, thank you for making this an even better athletic environment for the young female athletes at your high school. I have no doubt that now, and in the future, these young ladies will remember fondly their Principal and administrators who went the extra distance to ensure their time at their high school was a memorable one.

C; Supt. Daeschner
Jerry Wyman
KHSAA Title IX File

Sincerely,



Larry Boucher
Assistant Commissioner

Kentucky High School Athletic Association

September 16, 2005

Cory Miller, Athletic Director
Covington Holy Cross High School
3617 Church Street
Covington, KY 41015

Dear Mr. Miller:

After a careful review of your 2004-05 Annual Title IX Report submission, we forwarded to your school our analysis of your report. In an effort to be helpful, we requested several pieces of information to be submitted in our follow-up to you. Primarily we alerted you to the fact that your school's expenditures for boys' far exceed your average annual expenditures for girls' athletics. In addition, we asked for copies of previous Gender Equity Committee Meeting minutes to better evaluate any possible corrective actions on the part of your school to address these issues. Your response was: "The Holy Cross High School Title IX Equity Committee does not keep official records or minutes from their meetings. If your staff can document the reasoning behind this and when we were notified of this, we would be happy to do so."

Throughout the course of the Kentucky High School Athletic Association's seven year Title IX efforts, the Association has distributed on numerous occasions the KHSAA's "Steps For Assessing Title IX Compliance". This document, along with counsel given Holy Cross High School during the initial Title IX on-site visit, stipulates that Gender Equity Committees must be established and conducted in accordance with applicable law and accepted rules of order. Inherent throughout this document is reference to necessary communication, determinations and documentation on the part of the Gender Equity Committee. It is only through the accepted practice of documentation/minutes of Committee meetings that one, now or in the future, could ever determine a school's intention to identify and address corrective actions and desired compliance with Title IX.

The following two directives are hereby issued by the KHSAA:

1). Meet with your school's Gender Equity Committee in October, January and April of the years of 2005-06, 2006-07 and 2007-08. Provide to the KHSAA, not later than one week after the meeting, minutes of the Gender Equity Committee Meeting detailing the date of the meeting, who attended the meeting (the meeting attendees must include the Principal, Athletic Director, one male and one female head coach, a school board member, two or more parents, and one male and one female student athlete.....and a quorum of members must be present at each meeting), the time the meeting was called to order and adjourned, and those detailed athletic/Title IX discussions that involved corrective actions that might have been identified by this Committee or other interested parties.

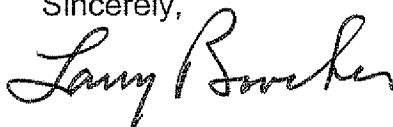
Holy Cross High School – Title IX
September 16, 2005
Page 2 of 2

2). Provide, no later than October 4, 2005 a breakdown of the number and names of head and assistant coaches you had in softball and baseball for the school years 2003-04 and 2004-05. Provide a contact phone number for each person listed. Provide the amount of salary or stipend that each individual was paid for those two years. Also, provide the intended salary or stipend for each head and assistant softball and baseball coach for the 2005-06 year. For the 2003-04 and 2004-05 seasons, provide the team varsity, junior varsity and freshman win-loss records, as well as the intended schedule of contests to be played for the 2005-06 season.

Should you not fully, and in good faith, comply with the directives of this letter, the KHSAA's initial action will be to eliminate your boy's baseball team from future post season competition, beginning with the 2005-06 season. Other action will be considered as necessary.

If you have any questions, feel free to contact me.

C: Commissioner DeVries
Diocese Supt. Bowman
Principal Clay Eifert

Sincerely,

Larry Boucher
Assistant Commissioner



HOLY CROSS HIGH SCHOOL

3617 Church Street, Covington, Kentucky 41015-1498

Phone 859-431-1335
Fax 859-655-2184
Email hchs@nkol.net

District
Parishes:

Cathedral
Holy Cross
Our Savior

St. Anthony
St. Augustine
St. Benedict

St. Cecilia
St. Matthew
St. Patrick

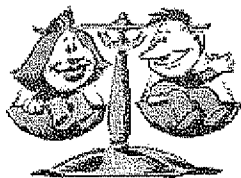
TO: Gordon Bocoock, Larry Boucher, and KHSAA Title IX Audit Team

FROM: Cory Miller, Athletic Director (Covington Holy Cross)

Date: May 25, 2005

The Holy Cross High School Title IX Equity Committee does not keep official records or minutes from their meetings. If your staff can document the reasoning behind this and when we were notified of this, we would be happy to do so.

The \$7300 differential in equipment expenses between baseball and softball are due in small part to the fact that we have a Freshman baseball team and not a Freshman softball team. This number will increase in future years if slow pitch softball is phased out. In the meantime, the equity committee will pay close attention to equipment expenditures among baseball and softball.



**KHSAA TITLE IX
ANNUAL REPORT SUBMISSION
STATUS REPORT
2004-2005**

KHSAA
Form T65
Revised 4/05

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

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

DATE: May 19, 2005

School	Holy Cross (Covington) High School	Reviewed by	Gordon Bocock
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The following is a status report regarding the required 2004 - 2005 Title IX Annual Report submission of forms due into the KHSAA office by April 15, 2005. Appropriate KHSAA Audit Team 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-35 (Budget Chart)
✓	T-1 (Summary Program Chart 1)	✓	T-36 (Budget Chart)
✓	T-2 (Summary Program Chart 2)	✓	T-41 (Checklist – Overall Interscholastic Program)
✓	T-3 (Summary Program Chart 3)		T-60 (Corrective Action Plan)
✓	T-4 (Summary Program Chart 4)		

II. Status

A.		2004 – 2005 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"> ▪ Although the Gender Equity Review Committee did meet three times, it is recommended that they meet at least once during the fall sports season, once during the winter sports season and once during the spring sports season. ▪ Form T-1 indicates that your percentage of total participation is 48% for girls and 52% for boys; however, Forms T-35 & T-36 indicate that 67% of the athletic budget was spent on boys while only 33% was spent on girls. The Equity Committee needs to meet and look at ways to bring the budget into better balance. The minutes of this Committee meeting and the Corrective Action Plan needs to be submitted to the KHSAA no later than June 15, 2005. ▪ The Equity Committee needs to address the \$7,300 difference between baseball and softball equipment expenses and send an explanation to the KHSAA no later than June 15, 2005.



KENTUCKY HIGH SCHOOL ATHLETIC ASSOCIATION STEPS FOR ASSESSING TITLE IX COMPLIANCE

I. The Superintendent of schools shall ensure the establishment of a Gender Equity Review Committee for each school.

- Committee Makeup
 1. Committee size should be workable. (8-10 people)
 2. Members could include Principal, Athletic Director, representatives from both boys and girls coaching staffs, the designated Title IX Coordinator from the district or school as reported to KDE, school board members, school board attorney, counselors, parents and student representatives.
 3. A coordinator should be elected to facilitate the committee and its proceedings.
- A minimum of three required meetings shall be scheduled per year and others as needed. A quorum of the committee members must be present and the meeting conducted in accordance with applicable state law and accepted rules of order.

Suggested dates:

- August - Fall Sports Review
- November - Winter Sports Review
- February - Spring Sports Review

4. Committee membership and mission should be reviewed every 3-5 years.

II. The Gender Equity Review Committee shall conduct an internal self-audit using self-assessment forms contained in the KHSAA Title IX Audit Document. Sample forms are contained in the KHSAA Audit Document.

- School personnel shall complete the self-audit and file updates with the KHSAA annually.
- A permanent Title IX records file shall be established and kept current at the school for completed self-audit assessment forms and other related material. This file shall be subject to the Kentucky Open Records Act and available upon request.

III. The Gender Equity Committee shall develop and continually monitor a Title IX action plan and time table for implementation. The plan should include changes and corrective action as a result of each audit. The plan should include a review of the current status of sports offerings for boys and girls and compare such things as:

- Locker Rooms, Practice and Competition Facilities
- Coaching Stipends
- Sports Budgets and Expenditures
 - Equipment, Supplies
 - Travel Allowances
 - Medical and Training Facilities
 - Total expenses for each gender
- Scheduling of games and practice times
- Coaching assistance
- Other support services such as booster organizations
- The Committee shall identify specific areas for improvement in the athletics program giving priority to items required for equitable treatment of girls and boys
- A timetable shall be established for improving current sports programs where needs are identified based on the following:
 1. A comparison of sports offerings for males and females
 2. Facility improvement development necessitated by the self-assessment
 3. Equalization of recognition programs
 4. Revisions in coaching staff identified by the self-assessment

IV. The Principal of each KHSAA member school shall submit the following to the KHSAA by April 15th of each year:

1. Form GE-19 (Annual Verification of Title IX Procedures)
2. Forms T-1 thru T-4 (Summary forms for Accommodation of Interests and Abilities)
3. Forms T-35 & T-36 (Budget Forms)
4. Form T-60 (An updated Corrective Action Plan)



Kentucky High School Athletic Association
2280 Executive Drive ° Lexington, KY 40505 ° www.khsaa.org ° (859)299-5472 (859)293-5999 (fax)

June 9, 2004

Principal Joyce Phillips
Corbin High School
1901 Synder Street
Corbin, KY 40701

Dear Ms. Phillips:

The Kentucky High School Athletic Association, through 702 KAR 7:065, has been directed by the Kentucky Board of Education to assist KHSAA member schools in their efforts to comply with Title IX. 702 KAR 7:065 is a condition of membership with the KHSAA and has been a major initiative since school year 1999-2000.

Part of that ongoing effort has been the requirement on the part of each member school to submit to the KHSAA an annual self-audit report by April 15th of each year. This report informs the KHSAA that Title IX monitoring efforts are ongoing so we can report to the Kentucky Board of Education that school personnel are making efforts to comply with Title IX.

Unfortunately, as of June 9, 2004, we have not received the required 2003-04 Title IX Annual Report Forms from Corbin High School. No communication has been received from your school as to why this report has not been submitted. As a result, we are unable to determine whether or not there has been any effort to comply with Title IX this year.

Please consider this letter notice that Corbin High School is fined \$250 for failure to comply with our five year old policy requiring the annual submittal of the Title IX Annual Report. The report, and payment of the fine must be submitted no later than July 1, 2004 or further penalties will be assessed. Please note that the KBE supports the position that schools failing to follow KHSAA Title IX procedures not be allowed to participate in interscholastic competition in any sport during the 2004-2005 school year.

Your prompt attention to this matter is greatly appreciated. Please feel free to contact me or Assistant Commissioner Larry Boucher to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read "Brigid L. DeVries". The signature is fluid and cursive, with a large initial "B" and "D".

Brigid L. DeVries
Commissioner

BD:dk

cc: Superintendent Ed McNeel, Corbin Public Schools
Assistant Commissioner Larry Boucher



Kentucky High School Athletic Association
2280 Executive Drive ° Lexington, KY 40505 ° www.khsaa.org ° (859)299-5472 (859)293-5999 (fax)

June 9, 2004

Principal Coy Samons
Paintsville High School
225 Second Street
Paintsville, KY 41240

Dear Mr. Samons:

The Kentucky High School Athletic Association, through 702 KAR 7:065, has been directed by the Kentucky Board of Education to assist KHSAA member schools in their efforts to comply with Title IX. 702 KAR 7:065 is a condition of membership with the KHSAA and has been a major initiative since school year 1999-2000.

Part of that ongoing effort has been the requirement on the part of each member school to submit to the KHSAA an annual self-audit report by April 15th of each year. This report informs the KHSAA that Title IX monitoring efforts are ongoing so we can report to the Kentucky Board of Education that school personnel are making efforts to comply with Title IX.

Unfortunately, as of June 9, 2004, we have not received the required 2003-04 Title IX Annual Report Forms from Paintsville High School. No communication has been received from your school as to why this report has not been submitted. As a result, we are unable to determine whether or not there has been any effort to comply with Title IX this year.

Please consider this letter notice that Paintsville High School is hereby fined \$250 for failure to comply with our five year old policy requiring the annual submittal of the Title IX Annual Report. The report, and payment of the fine must be submitted no later than July 1, 2004 or further penalties will be assessed. Please note that the KBE supports the position that schools failing to follow KHSAA Title IX procedures not be allowed to participate in interscholastic competition in any sport during the 2004-2005 school year.

Your prompt attention to this matter is greatly appreciated. Please feel free to contact me or Assistant Commissioner Larry Boucher to discuss this further.

Sincerely,

A handwritten signature in black ink that reads "Brigid L. DeVries". The signature is written in a cursive, flowing style.

Brigid L. DeVries
Commissioner

BD:dk

xc: Superintendent Jim Roe, Paintsville Schools
Assistant Commissioner Larry Boucher

December 6, 2004

Mr. Robert Ferguson, Principal
Red Bird High School
Beverly, Kentucky 40913

Dear Mr. Ferguson:

As you are aware, the Kentucky High School Athletic Association has been involved in a review of its member schools Title IX compliance efforts since the 1999-2000 school year. One of the original fundamental elements of the Title IX compliance program was that each member school must provide their girls basketball team "prime time or prime night" playing opportunities for their home basketball games comparable to those provided the boys. "Prime night/prime time" is basically defined as either Friday night, Saturday, Saturday night or Sunday.

In January 2004, Williamsburg High School was notified that they were not compliant with this "prime night" requirement for the 2003-04 school year. They were notified that they must be in compliance for the 2004-05 school year or punitive action would be taken. Williamsburg High School has remained non-compliant for the 2004-05 season and, therefore, will suffer the loss of one boys' home "prime time" contest during the 2004-05 season.

In accordance with the KHSAA's documented procedure for identifying that contest, that cancelled date regards all games against Red Bird scheduled at Williamsburg High School on February 4, 2005. The penalty also includes the payment of the game forfeiture fee listed in the contract to be paid to you by Williamsburg High School no later than the end of the 2005-05 regular season. I need to receive a copy of documents verifying that payment has been made. In addition, Williamsburg High School will not be allowed to reschedule a contest to replace this eliminated game. However, should you wish to, Red Bird may reschedule another opponent to replace this eliminated contest with Williamsburg.

Should you have any questions, please feel free to contact me.

C: Commissioner DeVries
Williamsburg High School

Sincerely,

Larry Boucher
Assistant Commissioner

Kentucky High School Athletic Association

September 19, 2005

Mr. Derrick McKnight, Principal
Breathitt County High School
2307 Bobcat Lane
Jackson, KY 41339

Dear Mr. McKnight:

Approximately six times each year, the Kentucky High School Athletic Association appears before the Kentucky Board of Education. One aspect of those visits is a required update on the status of the KHSAA's efforts to accomplish gender equity in our member schools athletic programs.

At our most recent appearance, there was dissatisfaction expressed by the KBE over the Title IX accomplishments of Breathitt County High School. They were most concerned about: (1) the cramped and overlapping usage of athletic facilities for girl's athletic programs; (2) the lack of established policies for the purpose of monitoring standards and compliance; and (3) the significant and ongoing disparity in the amount of annual funding provided for boy's athletics as compared to funding for girl's athletics.

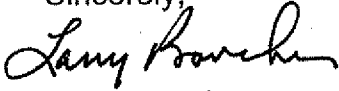
In an effort to assist your school toward compliance goals, I wish to set a date for a personal visit to your school, a tour of all of your athletic facilities and a discussion of goals and objectives with your school's Gender Equity Committee. I will be in your area on Wednesday, October 19, 2005 and would like to meet on that day. I want to tour the facilities at approximately 1:30 p.m. Following that tour I want to meet with your Gender Equity Committee at approximately 3:30 p.m. Those Committee members present at the meeting should include two parents, a female basketball player, a Breathitt County Board of Education member, a female volleyball player, the Athletic Director, the head volleyball and boys' basketball coaches, and any other members you chose to invite. If these members are not present, we will reschedule the portion of our visit with the Gender Equity Committee. Every effort should be made to ensure their attendance. Hopefully, the visit should conclude no later than 5:00 p.m. or earlier.

We are now in our seventh year of Title IX compliance efforts. I urge you to consider the seriousness of the fact that Title IX deficiencies are still a concern at Breathitt County High School. Please, let's work together to immediately eliminate all of these issues for your outstanding school and put these issues to rest. Anything less will result in unwanted penalties levied against your football program.

Breathitt County – Title IX
Page 2 of 2
September 19, 2005

I look forward to being with you on October 19th. If I may be of any assistance, please feel free to contact me.

C: Commissioner DeVries
Supt. Ron Eden
AD Mike Holcomb

Sincerely,

Larry Boucher
Assistant Commissioner



Kentucky High School Athletic Association

2280 Executive Drive ° Lexington, KY 40505 ° www.khsaa.org ° (859)299-5472 (859)293-5999 (fax)

May 17, 2004

Clay Eifert, Principal
Holy Cross (Covington) High School
3617 Church Street
Covington, KY 41015

Dear Mr. Eifert,

This letter comes in regard to the Holy Cross (Covington) High School 2003-2004 Title IX Annual Report. It is being sent back to be completed.

- Form GE19 – This form lacks the signatures of the Superintendent and School Board Chairperson.
- Forms T-35 & T-36 – These forms list the school's budget, but do not list any school expenditures in any sport. "N/A" or "non-applicable" are not acceptable appropriate responses for this required report. Travel expenses are to be listed in each sport. Awards can not be put together in one lump sum; they must be shown broken down by boys/girls in each sport.

The Gender Equity Review Committee should meet and go over this form and add their approval before it is resubmitted.

This document is to be resubmitted in a completed form to the KHSAA no later than **June 15, 2004.**

A handwritten signature in cursive script that reads 'Larry Boucher'.

Larry Boucher, KHSAA Assistant Commissioner

cc: Dr. Lawrence Bowman, Superintendent
Cory Miller, Athletic Director
Gordon Boccock, KHSAA Title IX Audit Team



Kentucky High School Athletic Association
2280 Executive Drive ° Lexington, KY 40505 ° www.khsaa.org ° (859)299-5472 (859)293-5999 (fax)

June 9, 2004

Principal Lee Kirkpatrick
Williamsburg High School
1000 Main Street
Williamsburg, KY 40769

Dear Mr. Kirkpatrick:

The Kentucky High School Athletic Association, through 702 KAR 7:065, has been directed by the Kentucky Board of Education to assist KHSAA member schools in their efforts to comply with Title IX. 702 KAR 7:065 is a condition of membership with the KHSAA and has been a major initiative since school year 1999-2000.

Part of that ongoing effort has been the requirement on the part of each member school to submit to the KHSAA an annual self-audit report by April 15th of each year. This report informs the KHSAA that Title IX monitoring efforts are ongoing so we can report to the Kentucky Board of Education that school personnel are making efforts to comply with Title IX.

Unfortunately, as of June 9, 2004, we have not received the required 2003-04 Title IX Annual Report Forms from Williamsburg High School. No communication has been received from your school as to why this report has not been submitted. As a result, we are unable to determine whether or not there has been any effort to comply with Title IX this year.

Please consider this letter notice that Williamsburg High School is hereby fined \$250 for failure to comply with our five year old policy requiring the annual submittal of the Title IX Annual Report. The report, and payment of the fine must be submitted no later than July 1, 2004 or further penalties will be assessed. Please note that the KBE supports the position that schools failing to follow KHSAA Title IX procedures not be allowed to participate in interscholastic competition in any sport during the 2004-2005 school year.

Your prompt attention to this matter is greatly appreciated. Please feel free to contact me or Assistant Commissioner Larry Boucher to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read "Brigid L. DeVries". The signature is fluid and cursive, with the first name "Brigid" being the most prominent.

Brigid L. DeVries
Commissioner

BD:dk

xc: Superintendent Dennis W. Byrd, Williamsburg Schools
Assistant Commissioner Larry Boucher

Kentucky High School Athletic Association

November 10, 2003

Mr. Dan Mercer, Principal
Raceland High School
500 Rams Blvd.
Raceland, KY 41169

Dear Mr. Mercer:

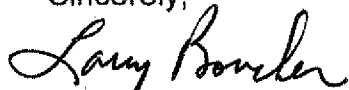
Based on an on-site Audit Review in the 2002-03 school year, KHSAA Audit Staff members requested information regarding the intent to be taken by Raceland High School to rectify the limited number of "prime time" playing opportunities afforded the girl's basketball team. Information received from Raceland High School did not adequately address the specific intent that was to be undertaken. In fact, a review of your 2003-04 girl's basketball schedule indicates just the opposite.....the girl's "prime time" opportunities diminished from 29% in 2002-03 to 18% in 2003-04. During the 2003-04 basketball season, your boy's teams "prime time" playing opportunities exist at 50%. Obviously, little, if any, attention has been focused on this Title IX deficiency.

You are directed to provide to the KHSAA, no later than December 1, 2003, written documentation regarding Raceland High School plans to ensure that no less than 40% of girl's basketball games for the 2004-05 season will be played during "prime time" opportunities. "Prime time" is defined as play on Friday and/or Saturday. Anything less than 40% "prime time" play in 2004-05 for girl's basketball will necessitate a review of the reduction or elimination of boy's basketball games played in "prime time.

Hopefully, other than our need to monitor this progress, you will ensure that further corrective action by the KHSAA will not be necessary and that Raceland High School girl's basketball players receive the same benefits Raceland High School's boy's basketball team members receive. If you have any questions, please contact me.

C: Commissioner DeVries

Sincerely,



Larry Boucher
Assistant Commissioner



Raceland

HOW MUCH DEBT DO YOU HAVE?

Choose One: None \$5,000 \$10,000 \$20,000+

(select a date to view from this list)

Boys

(select a team to view from this list)

(other scoreboards)

Region: 16
District: 63

This page last updated at Oct 3, 2003 9:10am

DATE	OPPONENT	SITE	SCORE
Dec 2, '03	West Carter	Raceland	- 7:30 PM
Dec 5, '03	Elliott County	Elliott County	- 7:30 PM
Dec 6, '03	Rowan County	(various sites)	- 7:30 PM EKC Tournament
Dec 12, '03	Rowan County	Raceland	- 7:30 PM
Dec 19, '03	Menifee County	Menifee County	- 7:30 PM
Dec 20, '03	Rockcastle County		-
Dec 27, '03	Green, OH	Green, OH	- 7:30 PM
Jan 6, '04	Russell	Russell	- 7:30 PM
Jan 9, '04	Lewis County	Raceland	- 7:30 PM
Jan 13, '04	Boyd County	Boyd County	- 7:30 PM
Jan 16, '04	Ironton-St. Joe, OH	Raceland	- 7:30 PM
Jan 19, '04	Bath County		- 7:30 PM 16th Region All "A" Classic
Jan 27, '04	Bath County	Raceland	- 7:30 PM
Jan 30, '04	Greenup County	Greenup County	- 7:30 PM
Feb 3, '04	Ironton, OH	Raceland	- 7:30 PM
Feb 6, '04	Nicholas County	Raceland	- 7:30 PM
Feb 10, '04	Fairview	Fairview	- 7:30 PM
Feb 13, '04	Elliott County	Raceland	- 7:30 PM
Feb 17, '04	East Carter	Raceland	- 7:30 PM
Feb 20, '04	Lawrence County	Lawrence County	- 7:30 PM
Feb 24, '04	Morgan County	Raceland	- 7:30 PM

50%
10/5

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HOW MUCH DEBT DO YOU HAVE?

Choose One: None \$5,000 \$10,000 \$20,000+



Raceland

HOW MUCH DEBT DO YOU HAVE?

Choose One: None \$5,000 \$10,000 \$20,000+

(select a date to view from this list)

Girls

(select a team to view from this list)

(other scoreboards)

This page last updated at Oct 2, 2003 11:53am

DATE	OPPONENT	SITE	SCORE
Dec 1, '03	Lewis County	Raceland	- 7:30 PM
Dec 4, '03	West Carter	Raceland	- 7:30 PM
Dec 6, '03	Rowan County	(various sites)	- 6:00 PM EKC Tournament
Dec 12, '03	Menifee County	Menifee County	- 7:30 PM
Dec 13, '03	Bath County	Raceland	- 4:30 PM
Dec 18, '03	Rose Hill Christian	Raceland	- 7:30 PM
Dec 20, '03	Sheldon Clark	Sheldon Clark	-
Dec 29, '03	Walton-Verona	Bellevue	- 5:00 PM Lady Tiger Christmas Classic
Jan 5, '04	East Carter	East Carter	- 7:30 PM
Jan 9, '04	Lawrence County	Lawrence County	- 7:30 PM
Jan 12, '04	Montgomery County	Raceland	- 7:30 PM
Jan 16, '04	Greenup County	Greenup County	- 7:30 PM
Jan 19, '04	Bath County		- 6:00 PM 16th Region All "A" Classic
Jan 26, '04	Elliott County	Raceland	- 7:30 PM
Jan 28, '04	Green, OH	Raceland	- 7:30 PM
Feb 2, '04	Russell	Russell	- 7:30 PM
Feb 6, '04	Morgan County	Morgan County	- 6:00 PM
Feb 12, '04	Fairview	Raceland	- 7:30 PM
Feb 16, '04	Greenup County	Raceland	- 7:30 PM
Feb 19, '04	Lewis County	Lewis County	- 7:30 PM
Feb 20, '04	Menifee County	Raceland	- 7:30 PM
Feb 23, '04	Rose Hill Christian	Rose Hill Christian	- 7:30 PM
Feb 26, '04	Rowan County	Raceland	- 7:30 PM

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HOW MUCH DEBT DO YOU HAVE?

Choose One: None \$5,000 \$10,000 \$20,000+

Kentucky High School Athletic Association

November 10, 2003

Mr. Dennis Bledsoe, Principal
Gallatin County High School
PO Box 146
Warsaw, KY 41095

Dear Mr. Bledsoe:

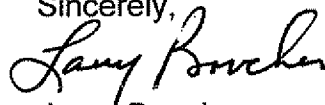
Based on an on-site Audit Review in the 2002-03 school year, KHSAA Audit Staff members requested information regarding the intent to be taken by Gallatin County High School to rectify the limited number of "prime time" playing opportunities afforded the girl's basketball team. Again, in August, 2003, we requested similar information. To date, despite our repeated request, we have not received any information regarding your school's intent to satisfy this Title IX deficiency.

You are directed to provide to the KHSAA, no later than December 1, 2003, written documentation regarding Gallatin County High School plans to ensure that no less than 40% of girl's basketball games for the 2004-05 season will be played during "prime time" opportunities. "Prime time" is defined as play on Friday and/or Saturday. Anything less than 40% "prime time" play in 2004-05 for girl's basketball will necessitate a review of the reduction or elimination of boy's basketball games played in "prime time. Just as a record of note, approximately 74% of boy's 2003-04 basketball games are being played in "prime time", while approximately 28% of girl's games are in "prime time."

Hopefully, other than to monitor this progress, you will ensure corrective action will not be necessary on the part of the KHSAA to provide Gallatin County High School girl's basketball players the same benefits GCHS boy's basketball team members receive. If you have any questions, please contact me.

C: Commissioner DeVries

Sincerely,



Larry Boucher
Assistant Commissioner

Kentucky High School Athletic Association

January 19, 2006

Mr. Jim Yount, Principal
Jackson City High School
940 Highland Ave.
Jackson, KY 41339

Dear Mr. Yount:

As you are aware, the Kentucky High School Athletic Association has been involved in a review of its member schools Title IX compliance efforts since the 1999-2000 school year. One of the original fundamental elements of the Title IX compliance program was that each member school must provide their girls basketball team "prime date/prime time" playing opportunities for their home basketball games comparable to those provided the boys. "Prime date" is basically defined as either Friday night, Saturday, Saturday night or Sunday.

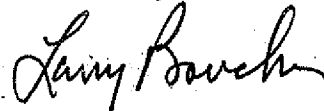
In October 2005 Riverside Christian High School was notified that they were not compliant with this "prime date" requirement for the 2005-06 school year. They were notified that they must be in compliance or punitive action would be taken. Riverside Christian High School has remained non-compliant for the 2005-06 season and, therefore, will suffer the loss of one boys' home "prime date" contest during the 2005-06 season.

In accordance with the KHSAA's documented procedure for identifying that contest, that cancelled date regards all boys games against Jackson City High School scheduled at Riverside Christian High School on February 3, 2006. The penalty also includes the payment of the game forfeiture fee listed in the contract to be paid to you by Riverside Christian High School no later than the end of the 2005-06 regular season. I need to receive a copy of documents verifying that payment has been made. In addition, Riverside Christian High School will not be allowed to reschedule a contest to replace this eliminated game. However, should you wish to, Jackson City High School may reschedule another opponent to replace this eliminated contest with Riverside Christian.

Should you have any questions, please feel free to contact me.

C: Commissioner DeVries
KHSAA Board of Control

Sincerely,



Larry Boucher
Assistant Commissioner

Mr. Randolph:

I'm also enclosing an earlier letter we sent to your school dated January 21, 2004 in which we attempted to alert you then to the concerns we had regarding Southwestern's "prime date/prime time" compliance efforts. This particular letter dealt with the 2003-04 season.

Larry Boucher

A handwritten signature in black ink, appearing to read "L. Boucher", written over the printed name.



Kentucky High School Athletic Association

2280 Executive Drive ° Lexington, KY 40505 ° www.khsaa.org ° (859)299-5472 (859)293-5999 (fax)

TO: Selected KHSAA Member School Principal
Pulaski Southwestern High School

FROM: Larry Boucher, Assistant Commissioner *L. Boucher*

DATE: January 21, 2004

SUBJECT: Title IX – Girls' Basketball
"Prime Time" Playing Opportunities

Since the inception of the Kentucky High School Athletic Association's involvement in Title IX, one of the hall marks of the program has been our efforts to ensure that each school's girls' "prime time" basketball playing opportunities are comparable to those opportunities afforded to the school's boys' basketball team. Throughout the five years of our Title IX efforts, we have shared this "prime time" information time and again with all KHSAA member schools through numerous Title IX seminars, workshops and publications, as well as our on-site visits.

"Prime time" is defined as playing opportunities on Friday night and/or Saturday/Saturday night and relate to home games for the contestants. "Prime time" basketball games played away from home do not address the equitable opportunities issues of Title IX. In addition, for boy/girl doubleheader home contests scheduled during Friday and/or Saturday, a rotation of starting game times should be accomplished to ensure further equity.

In a recent appearance before the Kentucky Board of Education, it was again reiterated that this equity benefit of Title IX should be met. In reviewing your school's boys' and girls' 2003-2004 basketball schedules, we have found that your "prime time" opportunities for the girls' team are insufficient when compared to those for the boys' basketball team. For the 2004-05 season, your girls' basketball "prime time" home playing opportunities should equal no less than 40% of their total home games. You should, given upcoming post season and scheduling meetings with other schools, be able to accomplish this objective. If this equity is not met within your basketball scheduling efforts, the KHSAA's initial response will be to begin the process of eliminating some of your boys' 2004-05 "prime time" home games.

We look forward to your cooperation and we hope that we will be able to share with the Kentucky Department of Education in July that all KHSAA member schools are in compliance. If you have any questions, please contact us.

Current 2003-04 "Prime Time" Game %:

Boys 67%

Girls 19%

Kentucky High School Athletic Association

January 17, 2006

Mr. Boyd Randolph, Principal
Southwestern High School
1765 WTLO Road
Somerset, KY 42503

Dear Mr. Randolph:

Regulations set forth in 702 KAR 7:065 stipulate that the Kentucky High School Athletic Association be designated as the agency to manage high school athletics in the Commonwealth of Kentucky. A portion of this regulation states "as a condition precedent to membership, require each member school and Superintendent to annually submit a written certification of compliance with 20 U.S.C. Section 1681 (Title IX)." During the 1999-2000 school year, after providing each school with a publication entitled Title IX Guidelines for Compliance at the High School Level, the KHSAA began visiting each member school in an effort to assist them in their compliance efforts.

One of the initial "focal points" of the project was to ensure that all schools establish prime date scheduling opportunities for girls' basketball. This requirement includes girls' teams playing a comparable portion, when compared to boys' prime date games, of their games on Friday night, Saturday or Sunday. Prime dates/prime time is defined as the time that is optimal for spectator attendance and team participation. This prime date and prime time requirement was emphasized and communicated, time and again, to all member schools at numerous KHSAA administrative workshops, Delegate Assembly Meetings, Commissioner's Notes, all Title IX on-site school visits and in the required annual Title IX audit reviews.

In October 2005, after over seven years of Association efforts to ensure prime date playing opportunities for girls' high school basketball, correspondence was sent to your school stating that you were not in compliance with comparable prime date percentage policies for the 2005-06 season. Your school was urged to take the corrective actions necessary to ensure that girls' basketball prime date playing opportunities would become comparable to those offered to your boys' basketball team for the 2005-06 season or a penalty would be assessed.

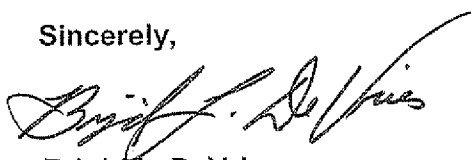
Unfortunately, after a continued check of your 2005-06 basketball schedules, we continue to find that you have failed to comply with this mandate. Therefore, the Kentucky High School Athletic Association is directing you to cancel all boys' basketball contests, including varsity, junior varsity and freshman games, against Lincoln County High School scheduled for February 14th, 2006. You will be required to pay (prior to the end of the 2005-06 regular season) the forfeiture fee established in the contract with the above named opponent. In addition, you will not be allowed to reschedule a contest to substitute for the loss of the above-mentioned game(s). Your opponent will be notified of this cancelled game.

2280 Executive Drive
Lexington, Kentucky 40505
(859) 299-5472 Fax (859) 293-5999

Should you have any questions, feel free to contact Assistant Commissioner Larry Boucher in our office.

C: KHSAA Board of Control
Superintendent
Athletic Director

Sincerely,

A handwritten signature in black ink, appearing to read "Brigid L. DeVries". The signature is written in a cursive style with a large, sweeping flourish at the end.

Brigid L. DeVries
Commissioner

Kentucky High School Athletic Association

January 17, 2006

Mr. Ty Howard, Principal
Lincoln County High School
Stanford, KY 40484

Dear Mr. Howard:

As you are aware, the Kentucky High School Athletic Association has been involved in a review of its member schools Title IX compliance efforts since the 1999-2000 school year. One of the original fundamental elements of the Title IX compliance program was that each member school must provide their girls basketball team "prime date/prime time" playing opportunities for their home basketball games comparable to those provided the boys. "Prime date" is basically defined as either Friday night, Saturday, Saturday night or Sunday.

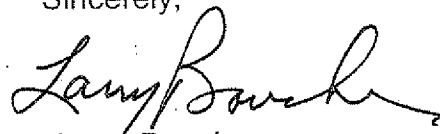
In October 2005 Pulaski Southwestern High School was notified that they were not compliant with this "prime date" requirement for the 2005-06 school year. They were notified that they must be in compliance or punitive action would be taken. Southwestern High School has remained non-compliant for the 2005-06 season and, therefore, will suffer the loss of one boys' home "prime date" contest during the 2005-06 season.

In accordance with the KHSAA's documented procedure for identifying that contest, that cancelled date regards all games against Lincoln County High School scheduled at Southwestern High School on February 14, 2006. The penalty also includes the payment of the game forfeiture fee listed in the contract to be paid to you by Southwestern High School no later than the end of the 2005-06 regular season. I need to receive a copy of documents verifying that payment has been made. In addition, Southwestern High School will not be allowed to reschedule a contest to replace this eliminated game. However, should you wish to, Lincoln County High School may reschedule another opponent to replace this eliminated contest with Southwestern.

Should you have any questions, please feel free to contact me.

C: Commissioner DeVries
KHSAA Board of Control

Sincerely,



Larry Boucher
Assistant Commissioner



f / Title IX / Prime Time Requirements / Prime Time Canceled Games

Kentucky High School Athletic Association

2280 Executive Drive ° Lexington, KY 40505 ° www.khsaa.org ° (859)299-5472 (859)293-5999 (fax) *20042005 / Williamsburg doc.*

TO: Principal Tom Faulkner
Williamsburg High School

FROM: Brigid DeVries, Commissioner

DATE: October 26, 2004

SUBJECT: Title IX - Cancellation of Basketball Contest

Regulations set forth in 702 KAR 7:065 stipulate that the Kentucky High School Athletic Association be designated as the agency to manage high school athletics in the Commonwealth of Kentucky. A portion of this regulation states "as a condition precedent to membership, require each member school and Superintendent to annually submit a written certification of compliance with 20 U.S.C. Section 1681 (Title IX)." During the 1999-2000 school year, after providing each school with a publication entitled Title IX Guidelines for Compliance at the High School Level, the KHSAA began visiting each member school in an effort to assist them in their compliance efforts.

One of the initial "focal points" of the project was to ensure that all schools establish prime time scheduling opportunities for girls' basketball. This requirement includes girls' teams playing a comparable portion, when compared to boys' prime time games, of their games on Friday night, Saturday or Sunday. Prime time is defined as the time that is optimal for spectator attendance and team participation. This prime time requirement was emphasized and communicated, time and again, to all member schools at numerous KHSAA administrative workshops, Delegate Assembly Meetings, Commissioner's Notes, all Title IX on-site school visits and in the required annual Title IX audit reviews.

In January 2004, after over five years of Association efforts to ensure prime time playing opportunities for girls' high school basketball, correspondence was sent to your school stating that you were not in compliance with comparable prime time percentage policies. Your school was informed that, for the 2004-05 season, girls' basketball prime time playing opportunities must be comparable to those offered to your boys' basketball team or a penalty would be assessed.

Unfortunately, after a check of your 2004-05 basketball schedules, we continue to find that you have failed to comply with this mandate. Therefore, the Kentucky High School Athletic Association is directing you to cancel all boys' basketball contests, including varsity, junior varsity and freshman games, against **Red Bird High School** scheduled for **February 4th, 2005**. You will be required to pay (prior to the end of the 2004-05 regular season) the forfeiture fee established in the contract with the above named opponent. In addition, you will not be allowed to reschedule a contest to substitute for the loss of the above-mentioned game(s). Your opponent will be notified of this cancelled game.

Should you feel you need to appeal this ruling, you may do so before the KHSAA Board of Control on Wednesday, November 17, 2004 at the KHSAA Office in Lexington, KY. Written notification of your intent to appeal must be received by the KHSAA no later than close of business on Friday, November 5, 2004. Should adjustments affecting your prime time contest schedule occur prior to November 17th, feel free to contact KHSAA Assistant Commissioner Larry Boucher at 859-299-5472.

c: KHSAA Board of Control
Superintendent
Athletic Director

HOLY CROSS HIGH SCHOOL

3617 Church Street, Covington, Kentucky 41015-1498 Phone 859-434-1335
Fax 859-655-2184

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Baseball vs. Softball – Title IX

Holy Cross High School is continuing its on-going assessment and evaluation of the baseball and softball programs. We have been instructed by the KHSAA of the deficiencies that exist between the two programs and that corrective action should take place before the start of the 2006 season. The major issues that our gender equity committee will be addressing deal with the number of coaches on staff, salary comparison between the coaches, and the amount spent on equipment and supplies between the two sports.

Corrective Action Plan

- A. Number of Coaches- HCHS is making a strong effort to narrow the gap in terms of total number of coaches for softball and baseball. Starting with the 2006 season, we are adding two paraprofessional coaches to our softball program that will be paid equally to their counterparts on the baseball staff. This now brings the total number of softball coaches to four.
- B. Salary Comparisons- The softball and baseball head coach will each be paid \$1500 for 2006 season. All other coaches will be paid between \$300-\$500. This should be in compliance with Title IX regulations.
- C. Spending on Equipment and Supplies- Holy Cross High School will be closely monitoring this area. Narrowing this gap will be a focal point over the next two seasons. Both head coaches will be made aware of this and spending will be closely watched. Our goal for the 2006 season is to narrow the spending by 50%. In 2005, baseball spent \$9100 on equipment and supplies and softball spent \$1800. If we reduce the difference in spending by 50%, there should be no more than a \$5450 difference between the two sports. Our gender equity committee is informed of this and we are working together for the betterment of our student-athletes at Holy Cross High School.

HOLY CROSS HIGH SCHOOL

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Holy Cross High School Weightroom

Access to the weightlifting facility at Holy Cross H.S. is based upon a first come-first serve policy. Any team or coach desiring access for his/her team must simply approach our Athletic Director Cory Miller to schedule a time that does not conflict with other teams. Mr. Miller works with all of the coaches to ensure that everyone can be accommodated fairly and equitably in the use of this resource. We are also in the process of transforming our locker-room to be more female friendly. We are adding dumbbells that are less weight and hanging posters and pictures of well known female athletes to entice and motivate our female student athletes to work hard and to use the weight room as a means of developing strength and team camaraderie.



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Policy Recognizing Student Athletes/Teams for Awards, Banners, etc.....

Holy Cross High School has several policies in place regarding the necessary credentials and accomplishments for an athlete or team to be honored with a banner, award, or recognition within the school. I have attached a copy of our criteria for a team to obtain a banner to be hung in the gymnasium. Our gender equity committee is familiar with this policy. Every team is required to honor their players in the form of an awards night at the conclusion of their season. Coaches are required to provide the athletic director with a player list and special awards that will be distributed to individual student athletes. The number of special awards and money spent on the awards night is monitored by the athletic director. The coaches are always encouraged to nominate their student athletes for local, statewide, and national recognition opportunities. Recognizing and acknowledging our student athletes within the school and on our schools website is a very important component of our coach's responsibility.

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CRITERIA FOR GYM BANNER (AS OF 4-17-04)

FALL SPORTS

Football-State Quarters (Regional Title)
Golf- Regional Title
Soccer- Subsectional Title
CC-Regional Title
Volleyball-Regional Title

WINTER SPORTS

Cheerleading- Top 25% (???)
Basketball- Regional Title
Swimming- Regional Title
Bowling- More Research

SPRING SPORTS

Tennis- Regional Title
Track- Top Four in State — ?
Softball- State Championship — ?
Baseball- Regional Title



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Policy on Travel and Per Diem Allowances

Each head coach at Holy Cross High School is responsible for submitting an annual budget to the athletic director and operates within those budget constraints. One expense that may be documented in the budget is money spent on travel and meal money. It's the athletic directors' job to monitor and evaluate spending as it relates to travel and per diem allowances to ensure that both girls and boys programs are treated equitably.



HOLY CROSS

HIGH SCHOOL

3175 Church Street, Covington, Kentucky 41015-1498 Phone 431-1335

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Title IX Meeting January 13, 2006

- I. Call to Order
- II. Results of Title IX Audit
- III. Documents that need to be submitted
- IV. Baseball vs. Softball
- V. Student Survey- 2006
- VI. Title IX Forms- Due April 15, 2006
- VII. Meeting Adjourned- Next Meeting- April ?, 2006

Title IX Minutes**January 13, 2006****3:00 – 3:30****Attended by:****Principal Clay Elfert****Athletic Director Cory Miller****Asst. Athletic Director and****Head Boys Basketball Coach Erik Goetz****Head Girls Soccer Coach Terry Bray****Guidance Counselor and Asst.****Girls Basketball Coach Anne Julian****Teacher and Counselor Jennifer Stropko****Student Representative Jeffrey West****Student Representative Brooke Lantry**

- I. Call to Order**
- II. Results of the Title IX Audit**
 - Generally favorable with the exception of the discrepancies in baseball and softball programs.
 - Additional coaches have been acquired for the softball program as well as a fast pitch schedule.
 - More adjustments are planned for the future.
- III. Documentation**
 - A new weight room schedule has been completed to allot more time for female athletes to use facilities.
 - Appropriate forms and schedules have been submitted.
- IV. Student Survey**
 - The student surveys are planned for February.
 - Additional changes may be made to accommodate student preferences.
- V. Title IX Forms**
 - Due by April 15, 2006
 - Cory is compiling the appropriate forms for the state
- VI. Meeting Adjourned**
 - Next meeting April 10, 2006?