



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

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

School: Villa Madonna
Prepared By: Gary W. Lawson
Date of Re-Visit: December 12, 2014
Telephone Number of Reviewer: **(859) 299-5472**
Reviewed By: **Darren Bilberry, Asst. Commissioner**

1. Completed Required Forms

Verification of Forms (Form GE-19) Yes No

Participation Opportunities Summary Chart (Form T-1, T-2, T-3 & T-4) Yes No

Benefits Summary Charts (Forms T-35 & T-36) Yes No

Checklist Overall Athletics Program (Form T-41) Yes No

Improvement Plan Summary Charts (Form T-60) Yes No

2. Opportunities Component of Title IX Compliance

Area of Compliance:
(Check One or More)

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

- A). Was the Substantial Proportionality Test (T-1) an area in which the school met Title IX Opportunities compliance?
Yes No

Comments: According to the rosters and information submitted in the annual Title IX reports, the school has met the standard established in Test 1 for the provision of athletic opportunities for females during two of the past three school years (2012-13 and 2013-14). The T-1 form in the 2013-14 annual Title IX report shows that female students were 55% of the school's enrollment, and made up 59% of its athletic participants.

- 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: The rosters and data submitted to KHSAA indicate that the school has not met the standard established in Test 2 for provision of athletic opportunities during any of the past three school years. The T-2 form in the 2013-14 annual Title IX report shows that no teams for either gender at any level have been added during the past five years.

- C). Was the Full and Effective Accommodations of Interest and Abilities Test (T-3) an area in which the school met Title IX Opportunities compliance?
Yes No

Comments: The responses on the T-3 forms in the last three Title IX school visit reports indicate that the standard established in Test 3 for provision of athletic opportunities is being met. It appears that these responses cannot be substantiated by the T-63 form which compiles the responses from the most recent student athletic interest survey. The form shows no (zero) interest in all sports listed that are not currently sponsored by the school. This situation is highly unlikely and renders all data submitted on this document to be questionable. (See *archery*, *bass fishing*, and *bowling* on the T-63 form in the 2013-14 annual report and *KHSAA Recommended Action*.)

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

Comments: The information on the T-63 form in the 2013-14 annual Title IX report shows that a 100% completion rate was received on the most recent student athletic interest survey. Although this is an excellent return rate, it seems unlikely that the information provided on the T-63 form is accurate. (See comments under section C above.)

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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>The February 19, 2003 Title IX school visit report rated this area <i>Satisfactory</i> stating that it appeared the standards established in both Tests 1 and 3 for the provision of athletic opportunities were being met. The December 13, 2006 report again deemed this category <i>Satisfactory</i> based on the school again meeting the standards for both Tests 1 and 3. The most recent submittals by the school show that the standards for Tests 1 and 3 are currently being met. However, compliance with the standard established Test 3 cannot be verified because the accuracy of the information on the T-63 form is questionable. (See detailed explanations for all three opportunities tests on page 2 of this report.) During the most recent visit, the school's Title IX file was reviewed and found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five years, an extra service pay schedule for coaches (see <i>Coaching</i>), a listing of the current members of the Gender Equity Review Committee, current game schedules for all school sponsored varsity teams, facilities usage schedules for all shared athletic venues (gym, weight training room, tennis courts, and soccer fields), written regulations regarding publicity, written designation of the locker room and athletic equipment storage space assigned each team, written minutes for one Gender Equity Review Committee meeting held in 2014-15 and a condensed summaries of all meetings held during each of the two previous years. School officials were reminded that minutes should be kept for each Gender Equity Review Committee meeting, and it was requested that the school have a minimum of three meetings each school year. (See <i>KHSAA Recommended Action</i>.) Also found in the file were copies of coaching contracts, a written booster club agreement, a written uniform review, rotation and/or replacement plan, written regulations relating to travel and per diem, and a copy of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). The school's</p>

Accommodation of Interests and Abilities continued			athletic director and administrators were commended for the development and maintenance of a very comprehensive and well organized Title IX file.
Equipment and Supplies	X		Both the 2003 and 2006 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . In 2003, the school had a uniform review and/or replacement plan based on a three-year cycle of review. In 2006, the plan had been modified to show a four-year cycle of rotation for all teams. The most recent visit revealed that the school was still implementing a uniform rotation plan based on a four-year cycle of review except for girls and boys golf and girls and boys swimming whose uniforms are replaced each year. All uniforms seen during the visit appeared to be of high quality and supplied in equitable quantities. According to information submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$93 per female athlete and \$92 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X		Both previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i> . Information provided during the recent visit indicated that the number of competitive events scheduled for teams of "like" sports was comparable. The facilities usage schedules revealed equitable assignment of the gym, soccer fields, and tennis courts. The importance of scheduling competitive events during the most optimal playing times was discussed with school officials. They were encouraged to strive for improvement and progress in relation to this benefit.
Travel and Per Diem Allowances	X		The two earlier Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . At the time of both visits, the vast majority of team travel was by automobile. The school had no access to buses. The most recent visit revealed that most teams are still transported by parents in automobiles. There are now guidelines in place which allow for the rental of a school bus if the distance to the competitive

Travel and Per Diem Allowances continued		<p>event is between 30 and 120 miles and a charter bus if the distance is more than 120 miles. The Title IX file also contained equitable guidelines for the provision of meals and lodging for student athletes. According to information in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$23 per female athlete and \$22 per male athlete for travel and per diem.</p>
Coaching	X	<p>The 2003 and 2006 Title IX school visit reports rated this benefit category <i>Satisfactory</i>. Each coach at the school is required to sign a written contract every year. The school's athletic director is responsible for evaluating all head coaches. A written instrument is not currently used as a part of this process. According to data provided on the T-35 form in the 2013-14 annual Title IX report, the total amounts spent for coaching salaries for teams of "like" sports were comparable. A review of the district's extra service pay schedule for coaches showed parity. <u>The schedule could be enhanced by showing the number of paid assistant coaches for each team.</u> According to numbers listing in the <i>Coaching</i> column on the T-35 form in the 2013-14 annual report, the coaching ratio for females was one coach per 9.5 participants and for males it was one coach per 8.5 participants. Information gathered during the most recent visit revealed that 22% (2/9) of the head coaches of girls teams and 25% (2/8) of the head coaches of boys teams were on-campus employees.</p>
Locker Rooms, Practice and Competitive Facilities	X	<p>The Title IX school visit reports for 2003 and 2006 designated this benefit category <i>Satisfactory</i>. The 2006 report documented that the amenities provided at all athletic facilities were of high quality and equitable. All the competitive venues currently being used at the school appear to provide equitable amenities for "like" sports. Both the softball and baseball fields are in need of scoreboards, and both fields appear to have some drainage problems. The challenges at these venues mirror each other, and, therefore, the amenities are considered equitable. The school has four</p>

Locker Rooms, Practice and Competitive Facilities continued			small but well maintained dressing rooms. All these areas are shared but appear to be assigned with equity as a high priority. Three fairly large athletic equipment storage areas are available at the school and are shared by all teams. The assignment of equipment storage areas is based on the size of the team served and proximity to the competitive facility. The school has one large coaching office which is shared by all teams.
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<p>Medical and Training Facilities and Services</p>	<p>X</p>	<p>The 2003 Title IX school visit report rated this benefit category <i>Satisfactory</i>, but did request that an equitable schedule for the weight training room be developed. The 2006 report judged this category <i>Satisfactory</i> while stating that an equitable usage schedule for the weight training facility was in the Title IX file <u>but not posted at the facility</u>. The most recent visit revealed that the school has a small, very clean, and well equipped weight training room located adjacent to the gym. There was an equitable usage schedule for this facility in the Title IX file and posted at the venue. There was a significant amount of equipment in the weight room that was suitable for use by female athletes. The schedule provided and the interviews with student athletes and coaches confirmed that the facility was used by almost all female athletic teams. An athletic trainer is provided on an equitable basis to all athletes on Tuesday and Friday afternoons through a contract with St. Elizabeth Hospital. All student athletes are responsible for getting their own physical examinations.</p>
<p>Publicity</p>	<p>X</p>	<p>The 2003 Title IX school visit report deemed this benefit category <i>Satisfactory</i> but did suggest that equitable written guidelines be developed for the posting of athletic recognition and the provision of equitable support by the school's cheerleading squad. The 2006 report rated this category <i>Satisfactory</i> and documented that the school did not have cheerleaders at that time due to a lack of interest. At the current time, the school still does not sponsor a cheerleading squad, dance team or pep band. The school's Title IX file contained a comprehensive set of guidelines for provision of equity within this benefit category. These guidelines cover the posting of banners for athletic recognition in the gym, awards and post season banquets, and the criteria for induction into the school's Athletic Hall of Fame. According to data submitted in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$5 per athlete for awards for</p>

			both male and female athletes.
Support Services	X		The Title IX school visit report for 2003 designated this benefit category <i>Deficient</i> mainly because the school had submitted inaccurate information on the T-35 and T-36 forms. The 2006 report rated this category <i>Satisfactory</i> stating that the expenditures submitted appeared to be accurate, and athletic spending showed parity. The school currently has one athletic booster club that supports all teams. The club makes two donations to the school each year. The donated funds are placed in school athletic accounts. The money is spent at the discretion of the school athletic administrators who monitor the spending of this money to provide equitable benefits. An analysis of athletic spending for the past two years showed that 58% of the athletic expenditures in 2012-13 was for female athletes who comprised 57% of the participants and 42% of the expenditures was for male athletes who comprised 43% of the participants. This translates into \$226 being spent per male athlete and \$211 per female athlete. In 2013-14, 56% of the expenditures were for female athletes (59% of participants) and 44% of the expenditures were for male athletes (41% of participants) which means approximately \$338 being spent for per female athlete and \$429 per male athlete. It appears that over this two-year period, athletic spending is within generally accepted parameters for parity for a non-football playing school.
Athletic Scholarships	NA		
Tutoring	NA		
Housing and Dining Facilities and Services	NA		

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

The school's most recent T-60 forms call for the following:

- reviewing the salary scale for coaches to insure that it is fender neutral; and
- researching the possibility of purchasing a school van for athletic transportation.

IT SHOULD BE NOTED THAT NO SCHOOL IMPROVEMENT PLAN WAS SUBMITTED FOR THE 2012-13 SCHOOL YEAR.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated in the body of this report. The school is commended for the provision of equitable opportunities and benefits for its student athletes. It is strongly recommended that the school administer the student athletic survey during the 2014-15 school year in order to accurately assess student interests and to obtain accurate data on which to base responses on the T-3 form in the April 30, 2015 annual Title IX report.

7. KHSAA Recommended Action in relation to new deficiencies

Although no deficiencies were designated as a result of the December 12, 2014 Title IX school visit, the following "area of concern" should be addressed in an attempt to provide equitable opportunities and benefits in the future.

(Accommodation of Interests and Abilities) On or before April 29, 2015, the school is to submit to KHSAA written minutes for each of at least three Gender Equity Review Committee meetings held during the 2014-15 school year. These minutes should include date of the meeting, agenda, summary of the content of discussions held during the meetings, and a listing of committee members in attendance.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the December 13, 2006 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Eric Schmitt, 2500 Amsterdam Rd., Villa Hills, KY 41017
(859) 331-6333 x- 103

District Level Title IX Coordinator: Michael Clines, 1125 Madison Ave., Covington, KY 41011
(859) 392-1500

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Charissa Junker	Student Athlete	(859) 331-6333
Alex Barton	Student Athlete	(859) 331-6333
Joe Cordonnier	Track Coach	(859) 331-6333
Don Shields	Bean of Students	(859) 331-6333
Brian Coburn	Girls Basketball Coach	(859) 331-6333
Eric Schmitt	Athletic Director	(859) 331-6333

Pamela McQueen	Principal	(859) 331-6333
Dave Thomas	Booster President	(859) 344-8407

10. Comments

No one from the community attended the Public Comments session. The meeting was adjourned at 3:20 p.m. EST.