

2021
ADMINISTRATIVE AUDIT
REPORT
AUDIT AND COMPLIANCE
DEPARTMENT

NGB NAME: USA Golf

ADMINISTRATIVE AUDIT SITE: Virtual

ADMINISTRATIVE AUDIT DATE: May 25, 2021

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (hereinafter “the Center”) is committed to building a sport community where participants can work and learn together in an atmosphere free of emotional, physical, and sexual misconduct. Federal law authorized the Center to develop training to prevent abuse and policies and procedures for implementation by National Governing Bodies (NGBs) and Paralympic Sports Organizations to prevent abuse.

In accordance with 36 U.S. Code §220541, the Center has been granted authority to complete regular and random audits of the NGBs recognized by the U.S. Olympic & Paralympic Committee. The Center will objectively evaluate adherence and level of compliance to the requirements set forth in the U.S. Center for SafeSport Code and the Minor Athlete Abuse Prevention Policies (“the MAAPP”).

AUDIT SCOPE

The scope of this 2021 audit is based on the Administrative Audit Standards released to NGBs/USOPC on January 19, 2021. The requirements for each section of the audit are included in Appendix A.

The Audit covered the following areas:

- > EDUCATION AND TRAINING
- > COMMUNICATION AND REPORTING
- > QUALITY CONTROL

AUDIT METHODOLOGY

The Center adhered to the following audit protocol:

- *reviewed policies and procedures
- *evaluated processes
- *administered implementation fidelity testing
- *conducted interviews with various individuals responsible for compliance with the Center’s requirements.

AUDIT SUMMARY

Based on the audit methodology performed, the Center made findings as to whether the standards in Appendix A were met for Education and Training, Communication and Reporting and Quality Control (each using scoring guidelines in Appendix B).

SCORING SUMMARY

<u>STANDARD</u>	<u>SCORE</u>
EDUCATION AND TRAINING	PARTIALLY IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL	IMPLEMENTED

REQUIREMENTS:

1. NGB must identify all Applicable Adults (Adult Participants in 2022) required to complete the Center's Core SafeSport training and provide list to the Center.
2. NGB must track and require all above Applicable Adults to complete training on an annual basis.
3. Mark in NGB database or membership system any Applicable Adult who has not completed the required training as not in good standing.
4. NGB offered, gave and tracked annually (with parental consent) training to minor athletes. NGB provided the Center with a description of the training and how it was offered.

SCORE:

Partially Implemented

RATIONALE:

USAG satisfied requirement No. 1.

Requirements No. 2 and 3 were partially satisfied. Of the 11 individuals selected for testing, only 9 (82%) had completed training as of the date of the audit. Additionally, board and staff selected for testing had lapses in their annual training cycles. USAG tracks individuals' training completion dates within their database but is not preventing individuals with lapsed or expired training from participating in USAG board/staff activities.

Requirement No. 4 was not applicable as USAG does not have any minor athletes.

CORRECTIVE ACTIONS:

USAG must (a) require and track that Applicable Adults are SafeSport trained annually and within 45 days of initial membership or upon beginning a new role subjecting them to the Education and Training policy within the MAAPP and (b) require and track that staff and Board are SafeSport trained on an annual basis regardless of whether they are participating in USAG activities.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

Yared Alula

ANTICIPATED TIMELINE:

2021-08-31

CORRECTIVE PLAN:

USA GOLF has informed the two USA GOLF Board members that they have until August 31, 2021, to complete training. USA GOLF will better monitor the training cycles of its Adult Participants by providing monthly written and telephonic notifications to ensure: (i) all Adult Participants are SafeSport trained annually or are prevented from participating in USA GOLF activities; and (ii) all staff and Board members are SafeSport trained annually regardless of participation in USA GOLF activities.

AUDIT AREA: COMMUNICATION AND REPORTING

REQUIREMENTS:

1. NGB must communicate each MAAPP Required Prevention Policy by posting to NGB's website.
2. NGB must communicate Education and Training policy by posting it to NGB's website.
3. NGB must provide most recent direct communication (must be within last year) of the NGB's MAAPP that was sent to all members via either email or newsletter
- 4 . NGB must provide most recent direct communication (must be within last year) of the Education and Training policy that was sent to all members via either email or newsletter
5. NGB must have public-facing reporting mechanism allowing individuals to report all concerns involving alleged physical misconduct, emotional misconduct, sexual misconduct, or violations of the MAAPP.
6. NGB must provide most recent direct communication (must be within last year) of the reporting mechanism, to include alleged MAAPP violations, to all Applicable Adults in the membership either via email or newsletter.

SCORE:

Implemented

RATIONALE:

USAG satisfied all requirements in this section.

CORRECTIVE ACTIONS:

No Corrective Action Required.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

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ANTICIPATED TIMELINE:

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CORRECTIVE PLAN:

No Management Response Required.

AUDIT AREA: QUALITY CONTROL SYSTEM

REQUIREMENTS:

1. NGB must provide documentation of their Quality Control System to be used at events/competitions

2. The Quality Control System must include the following:
 - a. Written policy and procedure to ensure adults who have not completed the Center's Core SafeSport training are notable to have regular contact and/or authority over minor athletes (this includes walk-ups, day-of registrants, replacement referees/officials etc.).
 - b. Written policy and procedure to ensure individuals who have been suspended and/or banned by the NGB and the U.S. Center for SafeSport are not able to participate in the event or competition.
 - c. Oversight and monitoring protocol by NGB including post event/competition review to ensure individuals who should be precluded from participating in the event/competition are not able to participate in future events/competitions.

SCORE:

Implemented

RATIONALE:

USAG satisfied all requirements in this section.

CORRECTIVE ACTIONS:

No Corrective Action Required.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

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ANTICIPATED TIMELINE:

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CORRECTIVE PLAN:

No Management Response Required.

1. EDUCATION AND TRAINING

1. Identify all Applicable Adults (Adult Participants in 2022) in organization required to complete U.S. Center for SafeSport Training (e.g., coaches, NGB board members, volunteers, adult athletes who have regular contact with minor athletes, officials).
2. Track all above Applicable Adults in a database or spreadsheet and provide the list to the Center.
3. Mark any Applicable Adult who has not completed the required training in Organization database or membership system as not in good standing.
4. Annually offer and give training to minor athletes, with parental consent, regarding prevention and reporting of child abuse. Get parental consent prior to any minor completing the training. And track the following:
 - A description of the training.
 - The date the training was offered and given.
 - A description of how the training was offered and given.

2. COMMUNICATION AND REPORTING

1. Provide communication of each of the Required Prevention Policy requirements by posting the policy to Organization's website.
2. Provide communication of Education and Training policy by posting the policy to Organization's website.
3. Provide most recent direct communication (must be within last year) of the NGB's MAAPP that was sent to all members via either email or newsletter.
4. Provide most recent direct communication (must be within last year) of Education and Training policy and requirements sent to all Applicable Adults via email or newsletter.
5. The Organization must have a public-facing mechanism allowing individuals to report all concerns involving alleged physical misconduct, emotional misconduct, sexual misconduct, or violations of the Minor Athlete Abuse Prevention Policies (MAAPP).
6. Provide most recent direct communication (must be within the last year) of the reporting mechanism, to include alleged MAAPP policy violations, to all Applicable Adults in the membership via either email or newsletter.

3. QUALITY CONTROL SYSTEM

1. Provide documentation of a Quality Control System Protocol that ensures suspended or banned individuals (either by the Center or the NGB/USOPC) and individuals who are not SafeSport-trained cannot register for or participate in an Organization's event/ competition.
2. Quality Control System Protocol must include:
 - Organization policies and procedures addressing participant registration, staffing and volunteers (e.g., requirement to cross-reference Center's Disciplinary Database prior to registration, manual list sent to competition organizers of those who are suspended or have not taken the Center's training, or give access to certain individuals running competition);
 - Policies and protocols in place to minimize the risk for individuals to slip through the cracks (1-day/short-term memberships, volunteers, on-site registration, last minute referee substitutions, etc.); and
 - Oversight and monitoring by Organization even if not on-site at an event (e.g., required to send list of participants to Organization if registration is not done through the Organization) and back-end oversight to catch individuals who should not participate (assuming registration is not done through the Organization on the front end).

NOT IMPLEMENTED

A finding of this type indicates a minimal reduction in risk to minor athletes and reveals what is determined to be a poor environment of safety and well-being for minor athletes.

This can be a result of, but not limited to the following:

- > Complete absence of policies and/or relevant and supporting documentation where required.
- > Complete absence of communication to Applicable Adults regarding specific policy/requirements.
- > Complete absence of reporting and oversight structure for Required Prevention Policy violations.
- > Less than 70% compliance on Education & Training requirements.

PARTIALLY IMPLEMENTED

A finding of this type indicates a moderate reduction in risk to minor athletes and reveals what is determined to be a limited environment of safety and well-being for minor athletes.

This can be a result of, but not limited to the following:

- > Presence of policies but missing relevant and supporting documentation.
- > Presence of policies that do not meet the mandatory minimum requirements of the MAAPP.
- > Not adequately or consistently providing communication to Applicable Adults regarding policy/requirements.
- > Lack of an adequate reporting and oversight structure for Required Prevention Policy violations.
- > Between 70% and 90% compliance on Education & Training requirements.

IMPLEMENTED

A finding of this type indicates a significant reduction in risk to minor athletes and reveals what is determined to be a satisfactory environment of safety and well-being for minor athletes.

This can be a result of, but not limited to the following:

- > Presence of policies and all relevant and supporting documentation provided where required.
- > Adequate and consistent communication to Applicable Adults.
- > Adequate reporting and oversight structure for Required Prevention Policy violations.
- > 90% or higher compliance on Education & Training requirements.