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 Event Audit Standards released to NGBs/USOPC on January 23, 2020. 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 on-site inspections and
* conducted interviews with various individuals at the site of the competition.

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).

<table>
<thead>
<tr>
<th>STANDARD</th>
<th>SCORE</th>
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<tbody>
<tr>
<td>EDUCATION AND TRAINING</td>
<td>Implemented</td>
</tr>
<tr>
<td>COMMUNICATION AND REPORTING</td>
<td>Partially Implemented</td>
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<tr>
<td>QUALITY CONTROL</td>
<td>Partially Implemented</td>
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**AUDIT AREA:** EDUCATION AND TRAINING

**REQUIREMENTS:**

1. NGB must identify all adults at event required to complete the Center’s Core SafeSport training.
2. NGB must provide a list of above adults to the Center.
3. NGB must ensure that all adults required to satisfy the Center’s core SafeSport training requirements did so prior to the event/competition.

**SCORE:** Implemented

**RATIONALE:**

Requirement No. 1 is satisfied. Of the 8 individuals selected for testing, 8 (100%) were either included, or properly excluded, from the list of individuals required to be trained.

Requirement No. 2 is satisfied. Requirement No. 3 is satisfied. Of the 16 individuals selected for testing, 15 (93.75%) had properly completed training prior to the event, including one individual who was determined to not be subject to the training requirements.

Requirement No. 3 is satisfied. Of the 16 individuals selected for testing, 15 (93.75%) had properly completed training prior to the event, including one individual who was determined to not be subject to the training requirements.

**CORRECTIVE ACTIONS:**

No Corrective Action required.

**MANAGEMENT RESPONSE**

**PROCESS OWNER/RESPONSIBLE INDIVIDUAL:**

**ANTICIPATED TIMELINE:**

**CORRECTIVE PLAN:**

No Management Response required.
### REQUIREMENTS:

1. NGB must communicate Reporting protocol and MAAPP requirements to the event director within the 30 days prior to the event/competition.
2. Event organizer (whether NGB or an Event Director) must communicate MAAPP requirements and Reporting protocol for MAAPP violations to all event/competition participants within the 30 days prior to the event/competition. Day-of registrants must also be informed of MAAPP requirements and Reporting protocol of violations of the MAAPP during the event registration process.

### SCORE:

| Partially Implemented |

### RATIONALE:

Requirement No. 1 is not applicable, as USS was responsible for the operation of, and was present at the event.

Requirement No. 2 is partially satisfied. USS communicated the MAAPP requirements and Reporting protocol of violations of the MAAPP to athletes, coaches, the head USS medical staff member, and the USS membership staff on March 11, 2021, which was within 30 days of the event. A communication of the above two requirements was not provided to officials, event staff/volunteers (including medical/trainers), and media members. Additionally, any individual that was added to participate in the event after the communication was sent out on March 11, 2021, did not receive a communication of the MAAPP requirements or reporting protocol of violations of the MAAPP.

### CORRECTIVE ACTIONS:

USS must (a) implement effective procedures to ensure all individuals participating in USS sanctioned events or competitions including all officials, event staff/volunteers, media members, and last minute or day-of volunteers/staff registrants receive MAAPP requirements and reporting protocol communications prior to a USS sanctioned event or competition; and (b) implement procedures to ensure MAAPP requirements and reporting protocols are communicated at all USS sanctioned events or competitions.

### MANAGEMENT RESPONSE

**PROCESS OWNER/RESPONSIBLE INDIVIDUAL:**

Sara Bowles

**ANTICIPATED TIMELINE:**

2021-07-30

**CORRECTIVE PLAN:**

USS will edit the current communication template to include the MAAPP at a glance, the reporting protocols flyer and other MAAPP resources. This communication template and resources will be distributed to event directors after sanctioning approval with instructions to distribute to applicable event participants at all USS sanctioned events. A QR code with a link to the MAAPP at a glance and reporting protocols flyer will be included to address last minute or day-of participants.
**AUDIT AREA:** QUALITY CONTROL SYSTEM

### REQUIREMENTS:

1. NGB must establish a quality control system for 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 not able 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:

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### RATIONALE:

Requirement No. 1 is satisfied.

Requirement No. 2(a) is partially satisfied. USS has written policy to check for the Center's Core SafeSport training for individuals who have registered or agreed to participate in the event prior to the start of the event. However, the policy does not state that USS will prevent an individual who has not completed the Center's training from having regular contact and/or authority over minor athletes. There is no written policy or procedure for how USS would check for the Center's training for last minute substitutions of participants or day-of registrations for event staff/volunteers. When event registration is done through USS, athletes are prevented from registering for an event without a valid USS membership (which includes SafeSport training). Otherwise, it is USS's procedure to manually check the participants for valid SafeSport training. It was discovered that an official, who did not have the necessary SafeSport Refresher training, was not prevented from having regular contact and/or authority over minor athletes. USS's policy also lacks procedure for ensuring individuals who have not completed the Center's training are not able to have regular contact with and/or authority over minor athletes at events or competitions when USS is not on site.

Requirement No. 2(b) is partially satisfied. USS has written policy to check if individuals who have registered or agreed to participate in the event prior to the start of the event are banned and/or suspended. However, the policy does not state that USS will prevent an individual who is banned and/or suspended from participating in an event or competition. There is no written policy or procedure for how USS would check their banned/suspended list for an individual who was substituted last minute or registered day-of the event. Athletes are prevented from registering for an event if they do not have a valid USS membership. Otherwise, it is USS's procedure to have the banned and/or suspended list memorized in order to check the remaining participants. USS's policy also lacks procedure for ensuring individuals who are banned and/or suspended from participating in any capacity at events or competitions when USS is not on site.

Requirement No. 2(c) is partially satisfied. Although USS has policy that states that an Event Director who does not have access to Sport.80 can send lists of coaches and officials to USS to check for eligibility to participate, the USS policy lacks the requirement for an Event Director to do so. USS also lacks protocol for when USS is not on-site for post event review to ensure individuals who should be precluded from participating in the event or competition are not able to participate in any capacity in future events or competitions.
CORRECTIVE ACTIONS:

USS must (a) update its written policy to state that USS will prevent participants who have not completed the Center’s training from having regular contact and/or authority over minor athletes at all USS sanctioned events/competitions; and (b) must implement effective procedures to ensure the above written policies are followed at all USS sanctioned events or competitions.

USS must (a) update its written policy to state that USS will prevent participants who are banned and/or suspended by USS or the Center from participating in any capacity at all USS sanctioned events or competitions; and (b) must implement effective procedures to ensure the above written policy is followed at all USS sanctioned events or competitions.

USS must develop oversight and monitoring protocol when not on-site to (a) ensure that participants who have not completed the Center’s Core SafeSport training are not able to have regular contact with and/or authority over minor athletes at all USS sanctioned events or competitions; and (b) participants who are banned and/or suspended by USS or the Center are prevented from participating in any capacity at all USS sanctioned events or competitions. This protocol must also include post event or competition review to ensure individuals who should be precluded from participating in the event are not able to participate in any capacity in future events or competitions.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:
Sara Bowles

ANTICIPATED TIMELINE:
2021-07-30

CORRECTIVE PLAN:

USS will update its written policy to state that required participants who have not completed the Center’s training will be prevented from having regular contact and/or authority over minor athletes at any USS sanctioned events or competitions. When on-site USS will be responsible to ensure that the policy is followed by utilizing Sport:80 for registration as a safeguard to block required participants who have not competed the SafeSport Training from registering for events/competitions. When not on-site USS will communicate the policy with the local organizing committee (LOC) who will be responsible to uphold the policy utilizing the same means as listed above.

USS will update its written policy to prevent participants who are banned and/or suspended by USS or the Center from participating in any capacity at all USS sanctioned events or competitions. When on-site USS will be responsible to ensure that the policy is followed and when not on-site USS will communicate the policy and the local organizing committee (LOC) will be responsible to cross check the list of banned members with participant lists at sanctioned events. A link to the most current list will be provided by USS to the LOC of a sanctioned event with the event communication package.

USS will develop a protocol to be used by the Local Organizing Committees (LOC) when not on-site. This protocol will include instructions to check all participants required to take the SafeSport training via Sport:80 and to ensure they are not allowed to participate if requirements have not been met. USS will also include the banned/suspended list and a link to the Centralized Disciplinary Database in a communication to the LOC when not on-site to prevent individuals on that list from participating in any capacity at all USS sanctioned events or competitions.
1. EDUCATION AND TRAINING
Auditor will request a list of all individuals specific to the NGB/USOPC who are required to take training (adult participants, coaches, referees/officials, volunteers, medical staff, contractors, etc.). All individuals with regular contact and/or authority over minor athletes must be SafeSport Trained prior to any event.

2. COMMUNICATION AND REPORTING
A minimum of one direct communication to event/competition organizers must be distributed no earlier than 30 days prior to the event/competition informing participants of the MAAPP requirements and be sent in the same manner as playing rules, code of conduct, etc. Communication must also include protocol for reporting suspected or alleged MAAPP violations.

3. QUALITY CONTROL SYSTEM
Auditor will evaluate the NGB/USOPC quality control system in place to ensure that suspended/banned individuals (either by the Center or the NGB/USOPC) and individuals who are not SafeSport Trained are unable to register or participate in the event/competition (testing based on credentialed, registered participants, not spectators).

**Quality Control System must include:**

- NGB/USOPC policies and procedures pertaining to participant registration, and 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 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.);

- Oversight and monitoring by NGB/USOPC even if not on-site (e.g., required to send list of participants to NGB/USOPC if registration is not done through NGB/USOPC) and back-end oversight to catch individuals who should not participate (assuming registration is not done through NGB/USOPC 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.