



# EVENT AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB NAME:

USA Gymnastics

EVENT AUDIT SITE:

USA Gymnastics Nationals

EVENT AUDIT DATE:

June 20-22, 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 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).

### SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	Partially Implemented
COMMUNICATION AND REPORTING	Partially Implemented
QUALITY CONTROL	Partially Implemented

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**AUDIT AREA: EDUCATION AND TRAINING**

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**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:**

Partially implemented

**RATIONALE:**

USAG did not satisfy Requirement Nos. 1 and 2. Of the 10 individuals selected for testing, 8 (80%) were included on or properly excluded from the list provided to the Center.

USAG satisfied Requirement No. 3. Of the 79 individuals selected for testing, 78 (98.7%) completed training within USAG's training cycle.

**CORRECTIVE ACTIONS:**

USAG must identify all individuals participating in USAG sanctioned events. This group must include, but is not limited to: security/risk management individuals, all medical providers (including third-party medical providers), and volunteers.

**MANAGEMENT RESPONSE**

**PROCESS OWNER/RESPONSIBLE INDIVIDUAL:**

Shelba Waldron

**ANTICIPATED TIMELINE:**

2021-11-30

## CORRECTIVE PLAN:

USA Gymnastics operates an event credentialing and security system designed to ensure compliance with stringent health and SafeSport requirements and to control access to restricted areas within the venue only to properly credentialed individuals. Credentials are issued only after verifying through multiple technology programs that, depending upon a person's participation status, the individual is current/completed SafeSport training, cleared background checks and in 2021 tested negative for COVID.

The aggregation of this data is controlled by the event director and the technology staff of USA Gymnastics, and lists are distributed to event staff for, among other things, registration, admission and security. No person can gain access to the restricted event floor without being identified on USA Gymnastics' list of credentialed persons. This was the state of event credentialing and security operations during the Center's audit of USA Gymnastics' 2021 Rhythmic Gymnastics Championships ("Gym Champs"), which was held simultaneously as the U.S. Olympic Trials in the same venue.

USA Gymnastics can produce a list of every non-spectator individual who is present at the event having regular contact with or authority over minor athletes and who are required to complete SafeSport training.

USA Gymnastics can produce the list of all competition participants at the event including coaches, athletes and judges who are required to complete SafeSport training. Each such participant must use the Meet Reservation System to register for the event. All of these individuals are required to complete SafeSport training, completion of which is verified against the Member Management System at the time of their registration for the sanctioned event. Since any individual whose SafeSport training is not current has their membership placed in pending status, that person is unable to register for a sanctioned event.

USA Gymnastics can produce its larger list of event participants including volunteers, security/risk management individuals, all medical providers (including third-party medical providers), volunteers, event staff and other individuals credentialed for the event by role, department and level of access at the event. From that list USA Gymnastics can identify those individuals who will have regular contact with or authority over athletes and be required to complete SafeSport training. Moreover, USA Gymnastics can identify how their SafeSport training was verified prior to admission.

The sole issue under review in this audit section involves the identification of three people who were not found on the lists of participants provided to the auditors. Yet these three individuals are identified on the full lists for Gym Champs and the U.S. Trials.

USA Gymnastics provided several lists for the event audit of Gym Champs. However, the list of all credentialed personnel was not provided to the auditors during the audit due to miscommunications. USA Gymnastics has offered the Center's auditors access to that list.

The audit list reviewed by the auditors excluded individuals deemed by USA Gymnastics to have only incidental contact or who did not have "authority over minor athletes." Other individuals excluded from the audit lists included those who held credentials for both the audited event as well as the US Olympic Trials, which was taking place simultaneously. One of the three people identified as not included on the audit list was a member of the USA Gymnastics contracted security team. According to the USA Gymnastics proposed Safe Sport policy, provided to and approved by the Center in April 2021 with no revision, contracted security was not considered a "participant" at the time of the event audit. However, given the auditors' comments, USA Gymnastic altered the approved Safe Sport policy to include contract security on the list of "participants," so the new membership cycle that started in August 2021 could incorporate this requirement. (NB: At the time of the event audit, USA Gymnastics nevertheless required its own security to be SafeSport trained and background checked.) The other 2 participants identified as missing from the participant lists were the Gym Champs event director and the registration staff lead who oversaw the admission processes for all the events that were taking place simultaneously in the venue, not specific to the audited event.

All three individuals “missing” from the auditor list are identified on the full lists for Gym Champs and U. S. Olympic Trials. All three individuals were and are SafeSport trained with background checks.

USA Gymnastics’ credentialing and security protocols performed as required during the events and the audit. It is the content of the list provided to the auditors that did not.

Action Step(s)

1. COMPLETED: In the event that the Center again audits an event where multiple events are occurring simultaneously, USA Gymnastics will provide the Center with the comprehensive list of credentialed Adult Participants, in all events.
2. IN PROCESS: USA Gymnastics is in the process of completing a policy summarizing the current protocol in more granular detail regarding how and what department will be responsible for identifying, verifying and submitting to the event director each category of credentialed participant and the roles that require SafeSport training and/or background checks. This will require coordination with the Center moving forward.

## AUDIT AREA: **COMMUNICATION AND REPORTING**

### **REQUIREMENTS:**

1. NGB must communicate Reporting protocol and MAAPP requirements to the event director within 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 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:**

USAG satisfied Requirement No. 1.

USAG did not satisfy Requirement No. 2. USAG did not communicate the required information to athletes participating in the event.

### **CORRECTIVE ACTIONS:**

USAG must develop and implement a policy and protocol that ensures communication of the required information to all participants, including athletes, at all USAG sanctioned events and competitions.

### **MANAGEMENT RESPONSE**

#### **PROCESS OWNER/RESPONSIBLE INDIVIDUAL:**

Shelba Waldron

#### **ANTICIPATED TIMELINE:**

2021-11-30

#### **CORRECTIVE PLAN:**

USA Gymnastics communication protocols relating to SafeSport, the MAAPP and reporting requirements is robust, integrated into event protocols, and fulfilled the requirements of this audit. The issue raised in this audit sector relates to the interpretation of the audit requirement that such communications must occur “no earlier than 30 days prior to the audit event.” USA Gymnastics provided those communications to all athletes – including minor athletes – on the day they picked up their registration packets and credentials, prior to the start of the event. As set forth below, USA Gymnastics’ implementation of its standard communications protocols met the audit standards.

Regular USA Gymnastics communication regarding SafeSport, the MAAPP and reporting requirements is distributed, published, and delivered to all participants, including minor athletes through their parents, through myriad networks and channels. This information was communicated as required by the audit standards no earlier than 30 days prior to the audit event to all adult participants, including non-members, via emails from their respective division leadership and was provided to minor athletes and all credentialed persons prior to the event on the day that they obtained their credentials.

It would be a circuitous interpretation of the audit standards to disallow the transmittal of such SafeSport and MAAPP communications on the day that the minor athlete or participant checks in and obtains their credentials for the event. Credentials are required to access the restricted training area and event floor and, as such, no minor athlete could have participated in the event without first obtaining this information prior to the event.

In addition, this information is and was also communicated regularly throughout the year to all participants, including the parents of minor athletes who serve as “proxy” for the minor athlete, and non-members. This information was further communicated on signage throughout the events and through PA announcements throughout the audit event and US Olympic Trials, which took place at the same time in the same venue. Further, in May 2021, USA Gymnastics produced, in cooperation with the US. Center for SafeSport, a webinar entitled “Parent’s Guide to Understanding USA Gymnastics Safe Sport,” which was posted on the USA Gymnastics website the following month, was distributed via social media eight (8) times, and was sent to all parents of minor athletes in August 2021. In addition, prior to the events, USA Gymnastics held multiple mandatory training sessions for all non-member volunteers and vendors.

A grid of the existing and regular USAG communication to members, including parents of minor athletes. There were other communications and mandatory training sessions held for other non-member participants also included in Appendix C. This grid clearly demonstrates compliance with the letter and intent of the Center’s requirements, and with the audit.

**Action Steps:**

1. USA Gymnastics met the letter and intent of the requirements of the audit. In Appendix C, USA Gymnastics respectfully provides a summary of the USA Gymnastics standard communications relating to SafeSport and MAAPP, which evidences compliance with the Center’s audit standards for all participants, including minor athletes. Nevertheless, USA Gymnastics is drafting a Safe Sport driven communications policy, which will incorporate a summary of the relevant policies relating to each communication including those published and disseminated to non-members, amplifying, and supplementing the information contained in Appendix C.

## AUDIT AREA: **QUALITY CONTROL**

### **REQUIREMENTS:**

1. NGB must establish a quality control system for their sanctioned 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:**

Partially implemented

### **RATIONALE:**

USAG satisfied Requirement No. 1.

USAG did not satisfy Requirement No. 2. USAG did not have a written policy outlining the steps of implementation of the quality control procedures used throughout the event.

### **CORRECTIVE ACTIONS:**

USAG must develop a written quality control system which documents the policies and protocols in place to effectuate all items in Requirement No. 2. In order to satisfy each section of Requirement No. 2, USAG must document the policies and procedures in place and/or develop and document policies and procedures to do each of the following: prevent participation by individuals who are included on the Organization Exclusion List, 2) prevent participation or regular contact with or authority over minors for those individuals who have not completed SafeSport training but are required to do so, 3) address one-day/short-term memberships; 4) address all last-minute and day-of registrations by individuals, including but not limited to: volunteers, coaches, athletes, and referees, and 5) provide oversight and monitoring of the above listed requirements by USAG for all events sanctioned by USAG.

### **MANAGEMENT RESPONSE**

#### **PROCESS OWNER/RESPONSIBLE INDIVIDUAL:**

Shelba Waldron

#### **ANTICIPATED TIMELINE:**

2021-11-30

## CORRECTIVE PLAN:

Existing USA Gymnastics policies and the operational quality control system prevent participation, regular contact with, or authority over minor athletes by individuals who have not completed SafeSport training when required to do so. The current system is described in paragraphs 1 – 5 below. USA Gymnastics did not present to the auditors an event checklist with a summary of all policies across all departments within USA Gymnastics that inform the mechanics of the quality control system. USA Gymnastics has produced an event quality control policy checklist, which can be found here.

### 1. Prevent participation by individuals who are included on the Organization Exclusion List.

For members, USA Gymnastics utilizes the Meet Reservation System (MRS) that is integrated with the Member Management System (MMS). The MMS system manages a member's educational requirements, background checks, meet registrations, personal information, and Safe Sport status. When a club or any other person attempts to register participants for an event, only those in good standing will be allowed to register for the event. To be deemed in "good standing" the individual must have current and completed SafeSport Core or Refresher training, successfully passed a current background check, completed USA Gymnastics educational requirements, and be absent from the permanently ineligible or suspended member list of USA Gymnastics and the US Center for SafeSport.

Any member that appears on the MRS participant list received by the Event Director has had their membership verified through MRS. (Please see Meet Reservation "How To" Guide.) Meet Directors manually check anyone not in the MRS against the Permanently Ineligible and suspended Members lists before being admitted to the event.

USA Gymnastics has provided and continues to provide multiple resources describing the prohibition against participation by individuals listed on the Permanently Ineligible or Suspended lists and provides links to the lists for verification. These resources are found here in the section entitled "Materials to Conduct a Safe Sport Compliant Event" and include:

- Safe Sport for Event Directors
- Safe Sport Announcer Scripts
- Permanently Ineligible and Suspended Member signage with QR Code
- Safe Sport Event Staff Mandate
- Safe Sport Reporting signage

### 2. Prevent participation, regular contact with, or authority over minor athletes for those individuals who have not completed SafeSport training but are required to do so.

Should any member appear the day of an event who has not previously registered through the USA Gymnastics Meet Reservation System which verifies completion of SafeSport Core Training, and that person intends to serve in a capacity which requires either regular contact with or authority over a minor athlete, that individual must provide proof of successful SafeSport Core Training within the past 12 months. If the individual is unable to do so, they will be required to complete SafeSport Core Training prior to entrance into the event. Failure to do so will result in denial of access to the event. This information will be contained in a cohesive Meet Director Handbook which is expected to be released by November 30, 2021.

### 3. Address one-day / short-term memberships.

USA Gymnastics does not allow for single day memberships or short-term memberships.

### 4. Address all last-minute and day-of registrations by individuals, including but not limited to volunteers, coaches, athletes, and referees.

Any individual who arrives at a USA Gymnastics sanctioned event last-minute or day-of and who will have regular contact with or authority over minor athletes and has not been previously registered through MRS, must show proof of current SafeSport Core or Refresher Training and be verified as absent from the permanently ineligible or suspended lists of USA Gymnastics and the U.S. Center for SafeSport in order to be allowed to participate. This information will be contained in a cohesive Meet Director Handbook which is expected to be released by November 30, 2021.

5. Provide oversight and monitoring of the above listed requirements by USAG for all events sanctioned by USAG.

USA Gymnastics Member Services provides a Sanction Report Form for each sanctioned event. USA Gymnastics Safe Sport, in collaboration with Member Services, has modified the Event Checklist document to include the prevention policies required by the Minor Athlete Abuse Prevention Policy (“MAAPP”) as well as the Center-approved USA Gymnastics’ Safe Sport Policy. The Safe Sport Event Checklist document will be included in the Sanction Report Form issued to each Meet Director of a USA Gymnastics’ sanctioned event on or after November 1, 2021 and can be located as a stand-alone document here. The Sanction Report Form is required to be completed and returned to USA Gymnastics Member Services within 72 hours of the event’s completion.

#### Action Steps

1. USA Gymnastics is in the process of preparing an event packet of Safe Sport protocols outlining our quality control system for events including a summary of the relevant policies that inform the actions. It is anticipated to be completed by Nov. 15, 2021. This document will be posted on our website and will include the following items:
  1. All items listed above already in place along with a summary of relevant policies.
  2. USAG Safe Sport Post Event checklist (noted in #5 above) will be implemented for all events occurring on or after November 1, 2021.
  3. USAG Safe Sport Post Event Checklist will be incorporated into the existing Sanction Report Form by November 1, 2021.
  4. Each USAG Safe Sport Post Event Checklist will be reviewed by Member Services staff for compliance. Should any responses be “flagged” by Member Services for possible MAAPP or USA Gymnastics’ Safe Sport Policy violation, this will be reported by Member Services to USA Gymnastics Safe Sport.

## 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.); and
- > 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.