

2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

USA Wrestling

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

February 23, 2022

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (the Center) is committed to building a sport community in which individuals can work and learn together in an atmosphere free of emotional, physical, and sexual abuse and misconduct. Federal law 36 U.S.C. §220541 authorizes the Center to develop and enforce abuse prevention policies and procedures that the U.S. Olympic & Paralympic Committee (USOPC) and its National Governing Bodies (NGBs) and Paralympic Sports Organizations (PSOs) must implement.

In accordance with that law, the Center has been granted authority to complete regular and random audits of NGBs, PSOs, and the USOPC. The Center objectively evaluates adherence and level of compliance to the requirements set forth in the SafeSport Code (the Code) and the Minor Athlete Abuse Prevention Policies (MAAPP).

AUDIT SCOPE

This 2022 audit is based on Administrative Audit Standards articulated in the Audit and Compliance Manual released by the Center on Jan. 11, 2022.

The audit covered the following areas:

- > EDUCATION AND TRAINING
- > COMMUNICATION AND REPORTING
- > QUALITY CONTROL
- > LOCAL AFFILIATED ORGANIZATIONS

AUDIT METHODOLOGY

During the audit, the Center:

- Reviewed policies and procedures
- Evaluated processes
- Administered implementation fidelity testing
- Interviewed individuals responsible for compliance with Center requirements

AUDIT SUMMARY

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

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	IMPLEMENTED
COMMUNICATION AND REPORTING	PARTIALLY IMPLEMENTED
QUALITY CONTROL SYSTEM	PARTIALLY IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	PARTIALLY IMPLEMENTED

AUDIT AREA: **EDUCATION AND TRAINING**

REQUIREMENTS:

1. Identify all Adult Participants in the organization required to annually (every 12 months) complete U.S. Center for SafeSport training.
2. Track all above Adult Participants in a database or spreadsheet and provide the list to the Center.
3. Mark any Adult Participant who has not completed the required training in Organization database or membership system as “not in good standing” and show proof of automated process or written policy that ensures these individuals are prevented from participation or from having regular contact or authority over amateur athletes who are minors. Staff and board members must be trained annually (every 12 months) regardless of participation or activity.
4. Annually (every 12 months) offer and give training to Minor Athletes regarding prevention and reporting of child abuse. Ensure these trainings are communicated to Minor Athletes by either email or newsletter. Get parental consent prior to their completion of training. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given
5. Annually (every 12 months) offer and give training to parents regarding prevention and reporting of child abuse. Ensure these trainings are communicated to parents by either email or newsletter. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given

SCORE:

Implemented

RATIONALE:

Requirement Nos. 1 and 2 are satisfied. Of the 14 individuals selected for testing, 14 (100%) were properly included, or properly excluded, from USA Wrestling’s (“USAW”) list of Adult Participants required to complete the Center’s SafeSport training.

Requirement No. 3 is satisfied. Of the 109 individuals selected for testing, 109 (100%) had completed training or were properly marked in their membership system as not in good standing. USAW’s membership system requires that an adult complete SafeSport training prior to purchasing USAW membership for the current season.

In order to prevent lapses in membership, an adult may complete training up to two weeks prior to the new membership season starting (September 1) and their SafeSport training would be valid through the end of the membership season (August 31st). As such, if an adult completes their SafeSport training in the August pre-season timeframe, an adult could have expired SafeSport training of up to two weeks during which time USAW would consider the training valid for participation in USAW events and activities. This finding does not impact the audit score.

Requirement Nos. 4 and 5 are satisfied. USA Wrestling offered to parents and Minor Athletes the Center’s prevention and reporting of child abuse trainings by e-mail on January 24, 2022.

CORRECTIVE ACTIONS:

USA Wrestling must implement effective procedures to ensure that adults who have expired SafeSport training prior to the season end are marked appropriately in their membership management system and do not have regular contact and/or authority over Minor Athletes.

AUDIT AREA: **EDUCATION AND TRAINING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Laura Peters & Tony Black

PROJECTED DEADLINE: July 15, 2022

CORRECTIVE PLAN:

USA Wrestling has implemented a manual process to deactivate memberships if their training is 365 days old. We have confirmed that this issue won't impact anyone until August 1, 2022. Between now and August 1 USA Wrestling will implement coding such that a member's membership will expire on day 365 after the applicable SafeSport training has been completed or August 31, 2022 (the end of the 2021-2022 membership year), whichever occurs first. For the 2022-2023 membership year any "current" membership will automatically turn from green (good standing) to red (not a current member) if the SafeSport training is more than 365 days old. If for some reason the coding is not in place, we will manually deactivate the members who this impacts when their training lapses.

AUDIT AREA: **COMMUNICATION AND REPORTING**

REQUIREMENTS:

1. Post the Organization's 2022 Center-approved MAAPP: Minor Athlete Abuse Prevention Policies (to include the Education & Training Policy and the Required Prevention Policies) on Organization website no later than January 1, 2022.
2. Provide direct communication of the Organization's 2022 Center-approved MAAPP Education and Training Policy and Required Prevention Policies to all members and Adult Participants no later than January 1, 2022, by either email or newsletter, and thereafter at least every new NGB membership cycle.
3. Have a mechanism on the Organization's public website (e.g., a form, link, or contact info for an athlete safety liaison) enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
4. Provide direct communication of the reporting mechanism in requirement #3 (separate from link to Organization's full Athlete Safety policy) to all members and Adult Participants no later than January 1, 2022, by either email or newsletter, and thereafter at least every new NGB membership cycle.
5. Provide the Organization's written protocol for communicating the Quality Control System (see Standard #3) to all sanctioned event directors of the Organization.
6. Provide the Organization's written protocol for communicating to all event participants within the Organization, the Center-approved Education and Training Policy and Required Prevention Policies and reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

SCORE:

Partially Implemented

RATIONALE:

Requirement No. 1 is partially satisfied. USA Wrestling posted their Organization's 2022 Center-approved MAAPP on USAW's website on January 2, 2022, which was after the January 1, 2022, deadline.

Requirement No. 3 is satisfied.

Requirement Nos. 2 and 4 are partially satisfied. USA Wrestling communicated their reporting mechanism and Center-approved MAAPP which includes the Required Prevention Policies and Education and Training policies to all members and Adult Participants by e-mail on January 24, 2022, which was after the January 1, 2022, deadline.

Requirement No. 5 is satisfied. USA Wrestling's provided a sample e-mail communication that is sent to event organizers after their event sanction applicable has been approved which contains a link to USAW's Quality Control System ("USA Wrestling Athlete Safety Procedures"). During the audit, USAW updated their event sanctioning approval process to include a written acknowledgment that the event organizer has reviewed and will adhere to the USA Wrestling Athlete Safety Procedures.

Requirement No. 6 is satisfied. USA Wrestling provided written protocol that states that event organizers are required to communicate the MAAPP and reporting mechanism to all event participants via e-mail prior to the event. The protocol also includes a requirement for event organizers to communicate the MAAPP and reporting mechanism to all day-of event participants either via QR code or signage and receive acknowledgement that they reviewed the policies.

AUDIT AREA: **COMMUNICATION AND REPORTING**

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

REQUIREMENTS:

1. Organization must implement a Quality Control System to ensure that individuals on the Organizational Exclusion List are unable to participate in any event, program, activity, or competition authorized by, organized by, or under the auspices of the Organization. The Quality Control System also must ensure that individuals who are required to be but are not SafeSport Trained are either prevented from participating or are in a role that does not include regular contact or authority over amateur athletes who are minors.
2. Quality Control System must include the Organization’s written implementation protocol—clear action steps to effectuate policies—pertaining to all participant registration and onsite check-in. This written protocol must include and address the following:
 - a. One-day/short-term memberships
 - b. Day-of participant registration (of athletes, volunteers, coaches, officials, etc.)
 - c. On-site registration/participation (of athletes, volunteers, coaches, officials, etc.)
 - d. Last-minute substitutions (of personnel such as referees, volunteers, etc.)
 - e. Oversight procedures by the Organization when their staff is not on-site at sanctioned events

SCORE:

Partially Implemented

RATIONALE:

Requirement No. 1 is partially satisfied. USA Wrestling has implemented a Quality control system to ensure that individuals who are required to be but are not SafeSport trained are prevented from participating or having a role with regular contact or authority over minor athletes. USA Wrestling has implemented a Quality Control System to ensure that USAW members participating in events/competitions are not on USAW’s Organizational Exclusion List. However, certain event volunteers, who are not members of USAW, are not checked against USAW’s Organization Exclusion List prior to participating in a volunteer role at the event/competition, such as, but may not be limited to, a ticket taker or towel tapper.

Requirement No. 2 and 2(a-e) are satisfied. USA Wrestling’s Quality Control System includes a protocol for event organizers to follow to verify SafeSport training for required individuals prior to an event by using USAW’s membership management system and/or automated event registration software. The Quality Control System also includes access to USAW’s Organizational Exclusion List for event organizers to utilize to ensure that individuals on the Organizational Exclusion List are unable to participate in the event. The protocols encompass all USAW memberships, even if it is a short-term membership.

USAW’s policy clearly states that’s any on-site or day of registration must follow the protocols for verifying SafeSport training and checking the Exclusion list for events with minor athletes. USAW’s policy includes a separate section specific to Events involving only Adult Participants but does not explicitly refer to the day-of registrations policy section. This finding does not impact the audit score.

USAW requires that all event organizers maintain a roster of participants and event personnel for each sanctioned event, to include their role and verification that they have each completed the necessary requirements before allowing access to the event for audit request by USAW or the Center.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

CORRECTIVE ACTIONS:

USA Wrestling must update their policy and implement effective procedures to ensure that all event participants and personnel, including by not limited to, volunteers, are not banned or suspended by USAW or the Center.

USA Wrestling must update their policy to state the protocols more explicitly for day-of registrations for events involving only adult participants.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Laura Peters & Tony Black

PROJECTED DEADLINE: July 15, 2022

CORRECTIVE PLAN:

USA Wrestling revised its Athlete Safety Procedures (aka Quality Control System) in March 2022 to account for the Center's audit comments. After approval from the Center, USA Wrestling posted the same in its event director portal.

AUDIT AREA: LOCAL AFFILIATED ORGANIZATIONS

REQUIREMENTS:

1. Organization must provide direct communication of the 2022 Center-approved MAAPP (to include the Education & Training Policy and Required Prevention Policies) sent to all LAOs, by email or newsletter, by January 1, 2022, and thereafter at least every new NGB membership cycle.
2. Organization's 2022 Center-approved Education & Training Policy and Required Prevention Policies must require LAOs to adhere to at least the minimum requirements of the NGB's MAAPP.

SCORE:

Partially Implemented

RATIONALE:

Requirement No. 1 is partially satisfied. USA Wrestling communicated their reporting mechanism and Center-approved MAAPP which includes the Required Prevention Policies and Education and Training policies to all LAOs by e-mail on January 24, 2022, which was after the January 1, 2022, deadline.

Requirement No. 2 is satisfied.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

1. EDUCATION AND TRAINING

1. Identify all Adult Participants in the organization required to annually (every 12 months) complete U.S. Center for SafeSport training (e.g., adult athletes who have regular contact with amateur athletes who are minors, coaches, board members, employees, interns, volunteers, officials).
2. Track all above Adult Participants in a database or spreadsheet and provide the list to the Center.
3. Mark any Adult Participant who has not completed the required training in Organization database or membership system as “not in good standing” and show proof of automated process or written policy that ensures these individuals are prevented from participation or from having regular contact or authority over amateur athletes who are minors. Staff and board members must be trained annually (every 12 months) regardless of participation or activity.
4. Annually (every 12 months) offer and give training to Minor Athletes regarding prevention and reporting of child abuse. Ensure these trainings are communicated to Minor Athletes by either email or newsletter. Get parental consent prior to their completion of training. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given
5. Annually (every 12 months) offer and give training to parents regarding prevention and reporting of child abuse. Ensure these trainings are communicated to parents by either email or newsletter. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given

2. COMMUNICATION AND REPORTING

1. Post the Organization’s 2022 Center-approved MAAPP: Minor Athlete Abuse Prevention Policies (to include the Education & Training Policy and the Required Prevention Policies) on Organization website no later than January 1, 2022.
2. Provide direct communication of the Organization’s 2022 Center-approved MAAPP Education and Training Policy and Required Prevention Policies to all members and Adult Participants no later than January 1, 2022 by either email or newsletter, and thereafter at least every new NGB membership cycle.
3. Have a mechanism on the Organization’s public website (e.g., a form, link, or contact info for an athlete safety liaison) enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
4. Provide direct communication of the reporting mechanism in requirement #3 (separate from link to Organization’s full Athlete Safety policy) to all members and Adult Participants no later than January 1, 2022 by either email or newsletter, and thereafter at least every new NGB membership cycle.
5. Provide the Organization’s written protocol for communicating the Quality Control System (see Standard #3) to all sanctioned event directors of the Organization.
6. Provide the Organization’s written protocol for communicating, to all event participants within the Organization, the Center-approved Education and Training Policy and Required Prevention Policies and reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

3. QUALITY CONTROL SYSTEM

1. Organization must implement a Quality Control System to ensure that individuals on the Organizational Exclusion List are unable to participate in any event, program, activity, or competition authorized by, organized by, or under the auspices of the Organization. The Quality Control System also must ensure that individuals who are required to be but are not SafeSport Trained are either prevented from participating or are in a role that does not include regular contact or authority over amateur athletes who are minors.
2. Quality Control System must include the Organization's written implementation protocol—clear action steps to effectuate policies—pertaining to all participant registration and onsite check-in. This written protocol must include and address the following:
 - a. One-day/short-term memberships
 - b. Day-of participant registration (of athletes, volunteers, coaches, officials, etc.)
 - c. On-site registration/participation (of athletes, volunteers, coaches, officials, etc.)
 - d. Last-minute substitutions (of personnel such as referees, volunteers, etc.)
 - e. Oversight procedures by the Organization when their staff is not on-site at sanctioned events

4. LOCAL AFFILIATED ORGANIZATIONS

1. Organization must provide direct communication of the 2022 Center-approved MAAPP (to include the Education & Training Policy and Required Prevention Policies) sent to all LAOs, by email or newsletter, by January 1, 2022, and thereafter at least every new NGB membership cycle.
2. Organization's 2022 Center-approved Education & Training Policy and Required Prevention Policies must require LAOs to adhere to at least the minimum requirements of the NGB's MAAPP.

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 result from, but is not limited to, the following:

- Complete absence of policies and/or relevant and supporting documentation where required
- Complete absence of communication to Adult Participants 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 result from, but is 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 Adult Participants regarding policy/requirements
- Lack of an adequate reporting and oversight structure for Required Prevention Policy violations
- Above 70% and below 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 result from, but is not limited to, the following:

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