



2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

USA Golf

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

June 15, 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	PARTIALLY IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	NOT APPLICABLE

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:

Partially Implemented

RATIONALE:

Requirements No. 1 is satisfied.

Requirement No. 2 is satisfied. The name randomly selected for testing was properly excluded from the list of Adult Participants required to complete the Center’s SafeSport training. However, the name selected was listed on the USAG web site as a current Board member. USAG provided documentation that this individual had retired and no longer serves on the USAG Board.

Requirement No. 3 is partially satisfied. Of the 4 names selected randomly for testing, 3 (75.00%), had completed training or were marked appropriately in their membership system. One board member was newly appointed to the board on April 1, 2022. The USAG policy states that those required to be SafeSport trained must do so “within the first 45 days of either initial membership or upon beginning a new role subject to this policy”, but no training for this individual had been completed as of June 15, 2022. The newly appointed board member was not marked as eligible or ineligible in USAGs tracking system. The individual was noted in a post-audit letter from USAG to be restricted from participating in any USAG activities, including without limitation the annual board meeting.

Requirement Nos. 4 and 5 are not applicable. USAG does not currently have minor athletes therefore USAG does not offer annual minor athlete or parent training. However, minor athletes could participate within USA Golf at future events.

AUDIT AREA: **EDUCATION AND TRAINING**

CORRECTIVE ACTIONS:

USA Golf must update its website with its most current board and staff members.

USA Golf must update its written policy and implement effective protocols to ensure that the mechanism used to track SafeSport training for all required to be trained - including staff and board - is kept current.

USA Golf must ensure that all Board members are SafeSport trained by September 15, 2022, regardless of Board activity.

USA Golf must update its policy to state that all Board members must be SafeSport trained on an annual basis, regardless of activity.

USA Golf must update its policy to state that minor athlete training and parent training will be offered when minor athletes are participating.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Yared Alula

PROJECTED DEADLINE: August 10, 2022

CORRECTIVE PLAN:

USA GOLF will update its website no later than August 31, 2022.

No later than August 31, 2022, USA GOLF will update its protocols to ensure that they remain current.

USA Golf will use best efforts to ensure that Andy Pazder, our last remaining untrained Board member, is trained by September 15.

Section V of USA GOLF's Safe Sport policy requires annual training. No later than August 31, 2022, USA GOLF will update its Safe Sport Policy to further confirm the need for annual training.

In Section I parts B and C of our MAAPP, we state that parents and minors will be offered when minors participate in USA GOLF. However, no later than August 31, 2022, we will reiterate this in our Safe Sport Policy.

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 (to include the Education & Training Policy and the 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:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Golf had their Center-approved MAAPP posted on their website by January 1, 2022 (on April 23, 2021).

Requirement No. 2 is satisfied. USA Golf communicated their Center-approved MAAPP and Required Prevention Policies to all board members and staff via email on April 23, 2021.

Requirement No. 3 is satisfied. USA Golf has a reporting mechanism on their public website enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

Requirement No. 4 is satisfied. USA Golf communicated the reporting mechanism to all board members and staff via email on April 23, 2021. In the email was a direct link to the Center's reporting web page.

Requirement No. 5 is not applicable. USA Golf does not operate, own or sanction events therefore USA Golf does not have a written protocol that demonstrates they communicate their Quality Control System to sanctioned event organizers. USA Golf provided a written protocol for how they would communicate the QCS, in the future, should they ever own a sanctioned event which would be by email to staff and board.

Requirement No. 6 is satisfied. USA Golf provided a written protocol that demonstrated they will communicate their Center-approved Education and Training Policy, Required Prevention Policies, and reporting protocols to all Adult Participants annually.

CORRECTIVE ACTIONS:

No Corrective Action required.

AUDIT AREA: **COMMUNICATION AND REPORTING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

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:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Golf does not operate, own or sanction events. USAG's Quality Control System (QCS) states that individuals on the Organizational Exclusion List (OEL) are unable to participate. USAG's QCS also ensures that individuals who are required to be but are not SafeSport Trained will be prevented from participating in the event should there be a USAG sanctioned event.

Requirements No. 2(a-d) are not applicable. USAG does not operate, own, or sanction events therefore does not have one-day/short term memberships, last-minute substitutions, day-of or on-site registrants or participants.

Requirement 2(e) is not applicable. USA Golf does not operate, own, or sanction events.

CORRECTIVE ACTIONS:

No Corrective Action required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

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:

Not Applicable

RATIONALE:

Not Applicable. USA Golf does not have Local Affiliated Organizations.

CORRECTIVE ACTIONS:

No Corrective Action 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:
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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