

2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

US Rowing

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

October 3, 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	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	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:

Requirements No. 1 is satisfied.

Requirement No. 2 is satisfied. Of the 42 names randomly selected for testing, (97.62%) 41 were properly included on the list of Adult Participants required to complete the Center’s SafeSport training.

Requirement No. 3 is satisfied. Of the 106 names selected randomly for testing, 106 (100%), had completed training or were marked as ‘not in good standing’ in their membership system.

Requirements No. 4 is satisfied. US Rowing (USR) offered the Center’s minor athlete training within their ‘Important Updates to Safe Sport Policy’ email communicated on December 15, 2021. USR plans to continue sending this ‘Important Updates To Safe Sport Policy’ communication annually via email.

Requirement 5 is satisfied. US Rowing offered the Center’s parent training via email communication on December 15, 2021. USR plans to continue sending this ‘Important Updates To Safe Sport Policy’ communication annually via email.

CORRECTIVE ACTIONS:

No Corrective Action required.

AUDIT AREA: **EDUCATION AND TRAINING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

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. US Rowing (USR) had their Center-approved MAAPP posted on their website by January 1, 2022 (on December 21, 2021).

Requirement No. 2 is satisfied. US Rowing communicated their Center-approved MAAPP and required prevention policies to all members via email prior to the required deadline on December 15, 2021.

Requirement No. 3 is satisfied. US Rowing 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. US Rowing communicated the reporting mechanism to all members via email prior to the required deadline on December 15, 2021.

Requirement No. 5 is satisfied. US Rowing provided a written protocol that demonstrated they communicate their Quality Control System to all sanctioned event organizers through the USR RegattaCentral system once a hosting membership is obtained.

Requirement No. 6 is satisfied. US Rowing provided a written protocol that demonstrated they communicate their Center-approved Education and Training Policy, Required Prevention Policies, and reporting protocols to all event participants via email sent upon each individual's completion of event registration.

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.

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. US Rowing’s (USR) Quality Control System (QCS) ensures individuals on the Organizational Exclusion List (OEL) are unable to participate in any sanctioned event. USR’s QCS also ensures that individuals who are required to be but are not SafeSport Trained are prevented from participating except for in a role that does not have regular contact with or authority over Minor Athletes.

Requirement No. 2(a) is not applicable. US Rowing does not allow one-day/short term memberships.

Requirement Nos. 2(b), (c) are satisfied. US Rowing has a policy for day-of, on-site registrations and participation. USR’s policy states “Adult Participants who sign up same-day for an event must already be compliant with their SafeSport training. The training will be confirmed during the same-day sign-up time period at registration by a member of the local organizing committee or US Rowing staff. These participants must also be checked against the US Rowing Exclusion List. Coaches and any other participants who register day-of are provided a copy of the MAAPP and Reporting policy”.

Requirement No. 2(d) is satisfied. US Rowing allows for last-minute substitutions in rare occasions. USR requires that a last-minute substitute must already be in good standing meaning current USR membership, current SafeSport training, verified against the OEL and will be provided the MAAPP and reporting mechanism onsite. When implementing protocols for any last-minute substitutions, USR abides by their day-of registration protocols.

Requirement No. 2(e) is satisfied. US Rowing has language in their QCS regarding oversight procedures for event directors by integrating their SafeSport requirements through their event registration that distributes automatic warnings for non-compliance to coaches and athletes leading up to each sanctioned event. There is also a back-end oversight by US Rowing to confirm accuracy of the event list, accuracy of those requiring SafeSport training and accuracy of checks against the Organization Exclusion List to ensure those not meeting the requirements do not participate. USR also states within the policy: ‘US Rowing may audit any US Rowing owned or sanctioned event at any time to verify compliance either in-person or through a request for compliance information’.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

CORRECTIVE ACTIONS:

No Corrective Actions 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:

Implemented

RATIONALE:

Requirement No.1 is satisfied. US Rowing provided their communication of the 2022 Center-approved MAAPP (including their Education & Training Policy and Required Prevent Policies) to all of their LAOs on December 15, 2021.

Requirement No.2 is satisfied. US Rowing requires in their 2022 Center-approved Education & Training Policy and Required Prevention Policies that LAOs administrators must adhere to the minimum standards of the MAAPP.

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:
 - 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