

# 2022 ADMINISTRATIVE AUDIT REPORT

## AUDIT AND COMPLIANCE DEPARTMENT

**NGB/PSO NAME:**

USA Fencing

**ADMINISTRATIVE AUDIT SITE:**

Virtual

**ADMINISTRATIVE AUDIT DATE:**

September 1, 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:**

Requirement No. 1 is satisfied.

Requirement No. 2 is satisfied. Of the 8 names randomly selected for testing, 8 (100%) 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 randomly selected for testing, 106 (100%) had completed training or were marked appropriately in their membership system as ineligible or not in good standing.

Requirement Nos. 4 and 5 are satisfied. USA Fencing offered Minor Athlete training and parent training on May 4, 2021, in the monthly newsletter sent out via email. The training link directed individuals to the Center’s on-line training site.

### **CORRECTIVE ACTIONS:**

No Corrective Action required.

### **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. USA Fencing had their Center-approved MAAPP posted on their website by January 1, 2022 (on July 20, 2021).

Requirement No. 2 is satisfied. USA Fencing communicated their Center-approved MAAPP and Required Prevention Policy to all members via email on July 20, 2021.

Requirement No. 3 is satisfied. USA Fencing 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 Fencing communicated the reporting mechanism to all members via email on December 9, 2021.

Requirement No. 5 is satisfied. USA Fencing provided a written protocol and timeline that demonstrated they communicate their Quality Control System to all sanctioned event directors via email upon event approval.

Requirement No. 6 is satisfied. USA Fencing provided a written protocol that demonstrates they communicate their Center-approved Education and Training Policy, Required Prevention Policies, and reporting protocols to all event participants via email. This protocol is within their Quality Control System.

### **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.

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

Requirement Nos. 2(b-d) are satisfied. USA Fencing’s Quality Control System (QCS) includes a protocol for event organizers to follow. In the event there are day-of participant registration, on-site registration/participation or last-minute substitutions, event organizers are required to be in contact with USA Fencing staff and track event participants registered to participate. They are required to check individuals in the membership system where it ensures individuals have valid membership which includes SafeSport Training, background check and not being listed on USA Fencing’s banned/suspended list. Individuals without a current membership are prevented from participation. Event organizers are responsible for cross checking the list of participants against the public-facing banned/suspended list on USA Fencing’s website.

Requirement No. 2(e) is satisfied. From within their master tournament database, USA Fencing is able to pull the roster of event participants for a sanctioned event at any time. Additionally, USA Fencing staff is in communication with event organizers. This includes communication of the QCS, policies and procedures and the list of participants. USA Fencing staff is responsible for tracking individuals who are not certified that have registered to ensure certification is complete prior to the event.

**CORRECTIVE ACTIONS:**

No Corrective Action required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

**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. USA Fencing communicated its Center-approved MAAPP, which includes the Education and Training Policies, the Required Prevention Policies, and the reporting mechanism, to all LAOs via email on July 20, 2021.

Requirement No. 2 is satisfied.

### 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