

2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

USA Gymnastics

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

October 11, 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	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 Nos. 1 and 2 are satisfied. Of the 24 individuals selected for testing, 24 (100%) were properly included, or properly excluded, from the list of Adult Participants required to complete the Center’s SafeSport training.

Requirement No. 3 is satisfied. Of the 117 individuals selected for testing, 117 (100%) had completed training or were properly marked in the membership system as not in good standing.

Requirement Nos. 4 and 5 are satisfied. USA Gymnastics (“USAG”) offered to minor athletes and parents the Center’s prevention and reporting of child abuse trainings by an e-mailed newsletter to parents on December 22, 2021, March 2022, May 2022, June 2022, and July 2022. USAG also offered to minor athletes and parents the Center’s prevent and reporting of child abuse trainings via the membership confirmation email that is automatically sent upon membership sign up.

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:

Partially Implemented

RATIONALE:

Requirement Nos. 1 and 3 are satisfied.

Requirement No. 2 is partially satisfied. USAG communicated its 2022 Center-approved MAAPP, which includes the Required Prevention Policies and Education and Training policies, before the January 1, 2022, deadline by e-mail to all members and USAG staff on December 22, 2021, member clubs on December 16, 2021, meet directors on December 15, 2021, and parents of minor athletes on December 22, 2021. However, USAG board members received the 2022 Center-approved MAAPP via email in April 2022, which was after the January 1, 2022, deadline.

In addition to the above communications, USAG has communicated its 2022 Center-approved MAAPP in additional newsletters to members, staff, member clubs, meet directors, and parents of minor athletes in August 2022. USAG also includes MAAPP information within athlete's membership cards and has regularly communicated its previous MAAPP on multiple occasions through various targeted newsletters to members, member clubs, meet directors and parents of minor athletes throughout 2021.

Requirement No. 4 is satisfied. USAG communicated its reporting mechanism by e-mail before the January 1, 2022, deadline to board members in August 2021, all members and USAG staff on December 22, 2021, member clubs on December 16, 2021, meet directors on December 15, 2021, and parents of minor athletes on December 22, 2021.

In addition to the above communications, USAG has communicated its reporting mechanism in additional newsletters to members, staff, member clubs, meet directors, and parents of minor athletes in August 2022. USAG also includes its reporting mechanism within athletes' membership cards and has regularly communicated its reporting mechanism on multiple occasions through various targeted newsletters to members, member clubs, meet directors and parents of minor athletes throughout 2021.

AUDIT AREA: **COMMUNICATION AND REPORTING**

Requirement No. 5 is satisfied. USAG provided its written protocol that states that it is the responsibility of USAG member services staff to communicate its Quality Control System (“QCS”) to event organizers via an annual distribution of the event tool kit, sanctioned event profile and sanctioned report forms to meet directors. USAG also makes its QCS available to all members on USAG’s website. Most recently, USAG emailed the QCS within the August 2022 Meet Directors newsletter.

Requirement No. 6 is satisfied. USAG provided its written protocol that states that event organizers must provide the USAG SafeSport Event Mandate to all event participants. This document includes information covering the MAAPP and how to report misconduct. USAG provides within its written protocol, SafeSport related scripts for event announcers, as well as SafeSport-related signage that an event organizer can use to post at events. Further, the protocol includes the requirement for event organizers to communicate the USAG SafeSport Event Mandate to any day-of event participants.

CORRECTIVE ACTIONS:

No Corrective Action required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN: N/A

USA Gymnastics’ response to Requirement No 2:

USAG determined that a technology error prevented the relevant MAAPP newsletter to be distributed to the board members on December 22, 2021. The technology listserv has been remediated.

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 Gymnastics’ Quality Control System (“QCS”) includes a protocol for event directors to utilize USAG’s meet registration system to verify SafeSport training completion and to ensure that an individual has not been banned and/or suspended by USAG or the Center. For any event participants not able to be entered into the meet registration system, the protocol requires that an event director obtain proof of valid SafeSport training and manually check USAG’s Organizational Exclusion List. The Organization Exclusion list is provided to event directors within the QCS.

Requirement Nos. 2 (a-e) are satisfied. USAG does not allow for any short-term memberships. The QCS protocols also encompass processes for on-site, day-of, and/or last-minute participation/registration.

USAG’s oversight protocol includes the requirement for all sanctioned event registration to be completed within its meet registration system to ensure that event participants have met all the SafeSport related requirements. USAG reserves the right to audit sanctioned events for the purposes of compliance with the Safe Sport policy. In addition, USAG requires that event directors submit sanction report forms, event participant sign-in sheets, and a SafeSport Event checklist within 72 hours of the conclusion of the event. Failure to return the completed sanction report forms with the checklist within the stated timeframe may result in and/or be considered a violation. USAG stated that staff reviews every submission from an event director to look for any issues or discrepancies.

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. All individuals at the LAO level are also members of USA Gymnastics. As such, USAG communicated its reporting mechanism and 2022 Center-approved MAAPP, which includes the Required Prevention Policies and Education and Training policies, to all LAOs as described in the above Communication and Reporting section.

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
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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