

2023 EVENT AUDIT REPORT

AUDIT AND COMPLIANCE
DEPARTMENT

NGB NAME:

USRowing

EVENT NAME:

2023 USRowing Youth National Championships

EVENT SITE:

Nathan Benderson Park

EVENT DATE:

June 7-8, 2023

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (the Center) is working to build a sport community in which everyone 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) must implement.

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

AUDIT SCOPE

This 2023 audit is based on Event Audit Standards articulated in the U.S. Center for SafeSport Audit and Compliance Manual.

The audit covered the following areas:

- > **EDUCATION AND TRAINING**
- > **COMMUNICATION AND REPORTING**
- > **QUALITY CONTROL**
- > **RESPONSE & RESOLUTION**
- > **MAAPP RISK ASSESSMENT**

AUDIT METHODOLOGY

During the audit, the Center:

- Reviewed policies and procedures
- Evaluated processes
- Administered implementation fidelity testing
- Conducted on-site inspections
- Interviewed individuals at the event site

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	PARTIALLY IMPLEMENTED
COMMUNICATION AND REPORTING	PARTIALLY IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
RESPONSE & RESOLUTION	IMPLEMENTED

REQUIREMENTS:

1. Organization representative or Event Director must provide to the Center a list of all individuals who will be at the event and are in a role that would require them to complete SafeSport training; these roles include (but are not limited to) event staff, adult athletes, adults having regular contact with or authority over amateur athletes who are minors, coaches, referees/officials, volunteers, medical staff, contractors, or others. The list must also include all NGB board and staff members, **regardless of whether they were at the event**. Organization must ensure that:
 - a. those at the event required to be SafeSport Trained are current in their training within the previous 12 months
 - b. the list provided is inclusive of all individuals at the event who should be SafeSport Trained
 - c. training is current for NGB board and staff
2. Organization must provide copy of a direct communication (email or newsletter), sent to membership annually (every 12 months), that offers training for parents and Minor Athletes regarding prevention and reporting of child abuse.

SCORE:

Partially Implemented

RATIONALE:

Requirement No. 1(a) is satisfied. Of the 101 individuals randomly selected for testing, 101 (100%) had either completed the Center’s training requirements within the previous 12 months prior to the event, were prevented from participating, or were determined to not need training to participate in the event.

Requirement No. 1(b) is partially satisfied. USRowing provided a list to the Center of individuals at the event required to be SafeSport trained. All categories of individuals required to be trained for the event were checked for training. USRowing allows for coaches and support staff to obtain a credential to participate at the event after the registration deadline but only after USRowing has checked and confirmed the individual has valid SafeSport training. However, USRowing does not have a mechanism that enables them to provide a list to the Center of coaches or support staff that have obtained a credential to participate after the event registration deadline.

Requirement No. 1(c) is satisfied. Of the 15 individual board and staff members randomly selected for testing, 15 (100%) had current training.

Requirement No. 2 is satisfied. USRowing offered to Minor Athletes and parents the Center’s prevention and reporting of child abuse training by e-mail on December 22, 2022.

CORRECTIVE ACTIONS:

1. USRowing must create and implement a protocol for ensuring the Center is provided accurate lists of event participants required to complete SafeSport training, including but not limited to, late-added or day-of coaches and support staff.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Pamela Adler

DEADLINE: December 21, 2023

CORRECTIVE PLAN:

1. USRowing will only provide event credentials to individuals already on the official attendance list. Member Organization administrators will have to validate any coaches or support staff through the regatta registration portal – including late/day-of additions – before these individuals receive their credentials. USRowing will direct non-approved individuals to contact their administrator for access, then use current systems and processes to validate and extend credentials to these participants.

AUDIT AREA: **COMMUNICATION AND REPORTING**

REQUIREMENTS:

1. Organization representative or Event Director must provide copy of a direct communication (either by email, newsletter, hard copy, or other electronic medium) made available to all event participants, including day-of registrants. Communication must include:
 - a. 2022 MAAPP requirements (either full policy or summary)
 - b. protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
2. Provide the Organization's written protocol for communicating—for all sanctioned events, to all event participants within the Organization—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. Provide proof of communication of Quality Control System sent to all event directors of sanctioned events within current membership cycle.

SCORE:

Partially Implemented

RATIONALE:

Requirement No. 1(a) and (b) is partially satisfied.

USRowing (USR) communicated a link to the MAAPP and reporting protocol to pre-registered athletes, coaches, and support staff on June 2, 2023. Within the email, USR clearly provided the Center's reporting portal for reporting allegations of sexual misconduct and it noted that 'all other forms of misconduct including violations of the MAAPP' can be made to USR. The email provides links to multiple resources including, 'USRowing's Safe Sport Reporting Procedures' website and USR's Safe Sport manual which includes more detailed reporting protocols for sexual, physical, and emotional misconduct as well as violations of the MAAPP.

The 'Safe Sport Reporting Procedures' website does not detail the types of "misconduct" that may be reported to USRowing. The website provides a form for submitting a SafeSport incident and within the form, an individual can select the type of misconduct, including 'violations of the MAAPP', 'physical misconduct' and 'emotional misconduct'. This finding does not impact the audit score.

USRowing utilized a QR code for communicating the MAAPP to volunteers. The QR Code directed users to an attestation form, which the volunteer was asked to sign and attest that they have read and understood the MAAPP. The MAAPP link directed the user to the USR 'SafeSport MAAPP Resources' website, which linked to the 'MAAPP-at-a-glance' and a 'How to Report' flyer. There were no clear links to the reporting protocol in the email or on the attestation form.

On June 9, 2023, USR communicated to vendors a link to the MAAPP utilizing the 'SafeSport MAAPP Resources' website. In this email, there was a link to the 'Safe Sport Reporting Procedures' website described above. In the email, vendors were asked to sign the attestation form.

On June 9, 2023, USR communicated to media a link to the MAAPP utilizing the 'SafeSport MAAPP Resources' website and the attestation form. There were no clear links to the reporting protocol in the email or on the attestation form.

Approximately half of the participants that were requested to sign the attestation form, signed it.

MAAPP-related signage with graphics was observed throughout the event space. In addition, the online entry packet linked on the event website included SafeSport-related content such as reporting information, training requirements, and links to USRowing's Safe Sport Policy Manual and the 'SafeSport Reporting Procedures' website.

AUDIT AREA: **COMMUNICATION AND REPORTING**

USR places the responsibility on its Local Organizing Committee (LOC) to communicate the MAAPP and reporting protocol to its LOC-related event personnel. The LOC stated that there are MAAPP related signs around the facility but did not provide any direct communication to its personnel related to the MAAPP or reporting protocol. USR states that the USR staff communicates the policies to an LOC staff member in pre-event meetings, however no documentation could be provided of pre-event policy discussions.

Because support staff and coaches may be added to a team's roster after the registration deadline, these 'late-added' support staff and coaches did not receive the June 2 email and were not provided any direct pre-event communications of the MAAPP or reporting protocol.

No documentation of pre-event communications was provided for the audit for referees or individuals responsible for timing. However, USR provided a membership-wide newsletter which included a link to the MAAPP and the 'SafeSport Reporting Procedures' website that was emailed on December 22, 2022, which these individuals may have received.

Requirement No. 2 is satisfied. USR provided a written policy that states that prior to each event, all registered participants and relevant Adult Participants must receive a copy of the USRowing Safe Sport Policy Manual, which includes the MAAPP and reporting protocols. The protocol includes sample email language to use as guidance. This sample language does not provide clear direction for reporting physical or emotional misconduct but does provide further reporting information for reporting these types of misconduct within the linked Safe Sport Manual. The written policy states that coaches and any other participants who register on the day of the event must be provided a copy of the MAAPP and reporting policy.

Requirement No. 3 is satisfied. USR provided documentation that they have the Athlete Safety Procedures for USRowing Event Organizers (Quality Control System) linked on the USRowing 'Registered Regatta' webpage. However, event organizers were not directly communicated the website or Quality Control System policy. Shortly after the event, USR updated its online event sanctioning process to include a link to the Quality Control System with an acknowledgement that events are required to adhere to the protocols.

CORRECTIVE ACTIONS:

1. USRowing must (a) develop a protocol for all sanctioned events and (b) provide proof of implementation to ensure that all event participants, including but not limited to, late-added/day-of coaches and support staff, LOC-related personnel, timing staff, and referees receive the following communications prior to the event or upon registration/credentialing:
 - a. USRowing's MAAPP
 - b. Explicitly stating reporting protocol for each of: alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
2. USRowing must update all of its communication resources to ensure that the reporting protocol includes explicit directions for how to report all allegations for each of: sexual, physical, and emotional misconduct and violations of the MAAPP. Resources include, but are not limited to:
 - a. Safe Sport MAAPP Resources website
 - b. Safe Sport Reporting Procedures website
 - c. Communication templates
 - d. Attestation Form

AUDIT AREA: **COMMUNICATION AND REPORTING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Pamela Adler

DEADLINE: December 21, 2023

CORRECTIVE PLAN:

1. Any Participant added to a regatta entry, including those added after a regatta has begun and up to the late entry deadline, will receive the required communications listed. This one-time individual email for all owned and sanctioned events will have communications regarding the USRowing Safe Sport Policy (including the MAAPP) and information on how to report Sexual Misconduct to the U.S. Center for SafeSport, and Emotional and Physical Misconduct, any other forms of Prohibited Conduct, and violations of the MAAPP to USRowing. USRowing will use current systems and processes to distribute these communications to all Participants.
2. USRowing will standardize language across all platforms by December 21, 2023.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

REQUIREMENTS:

1. Organization or Event Director 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 must also 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 with or authority over amateur athletes who are minors.
2. The 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/on-site participant registration/substitutions (of athletes, staff, volunteers, vendors, coaches, officials, etc.)
 - c. Oversight procedures by the Organization when their staff is not on site at sanctioned events

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USRowing's (USR) Quality Control System (QCS) includes a written protocol to verify that all event participants such as adult athletes, coaches, officials, and support staff have completed SafeSport training prior to participating in the event. USR utilizes an adult-athlete attestation process where adult athletes attest to USR whether or not they have regular contact with Minor Athletes. All coaches, officials, and support staff are required to complete SafeSport training. USR utilizes its event registration and membership management systems to ensure SafeSport training is valid prior to providing a credential to the participant. The QCS also includes a written protocol that states that event organizers manually check its participant list against its Organizational Exclusion List (OEL).

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

Requirement No. 2(b) is satisfied. USRowing has a policy for day-of 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 at registration by a member of the local organizing committee or USRowing staff. These participants must also be checked against the USRowing Organizational Exclusion List.

Requirement No. 2(c) is satisfied. USRowing has a written policy in the QCS that states, "USRowing is making an ongoing investment in roster maintenance and compliance software that will help us, and our members verify that participants are compliant with our membership, insurance, and SafeSport training requirements. The burden of compliance, while shared in practice, lies with our member organizations and we continuously communicate with them about requirements and the risk of non-compliance. SafeSport compliance is an integrated requirement through the largest event registration vendor in our sport and automatic warnings for non-compliance are distributed to coaches and athletes in the lead up to each USRowing sanctioned or hosted regatta." The QCS also states "USRowing and/or the U.S. Center for SafeSport may audit any USRowing owned or sanctioned event at any time to verify compliance either in person or through a request for compliance information."

CORRECTIVE ACTIONS:

No Corrective Actions required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

MANAGEMENT RESPONSE
RESPONSIBLE INDIVIDUAL: N/A
DEADLINE: N/A
CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **RESPONSE & RESOLUTION**

REQUIREMENTS:

(Summarized here: see Appendix B for full requirements effective Jan. 1, 2023):

1. Organization must provide its Response & Resolution policies to the Center.
2. Organization must post Center-specified Response & Resolution policy elements—and corresponding details—to its public website no later than Jan, 1, 2023. These elements include:
 - a. Reporting Mechanism
 - b. Referral of Reports to the Center
 - c. Jurisdiction Notifications
 - d. Mandatory Reporting
 - e. Prohibition of Retaliation
 - f. Response & Resolution of Reported Allegations
 - g. No Interference
3. Organization must ensure:
 - a. policies include language preventing Organization from interfering with any Center investigation.
 - b. requests from the Center are responded to within 72 hours
 - c. Organization has an assigned contact person responsible for replying to requests from the Center
4. Organization must provide the Center its written policy for collecting Data of Matters Addressed by the Organization, encompassing all elements listed in Appendix B Section 5.
 - a. Policy must also include Organization’s protocol to collect such data from LAOs, if applicable

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USRowing (USR) provided its Response and Resolution policies which are contained within its “USRowing Safe Sport Policy Manual”.

Requirement No. 2 is satisfied. USRowing posted to its public website the Center-specific Response & Resolution policies by the January 1, 2023, deadline (on December 20, 2022).

Requirement No. 2(a) is satisfied. USRowing’s reporting website stipulates that all reports involving sexual misconduct must be reported directly to the US Center for SafeSport (as well as law enforcement) and all other reports of misconduct may be reported to USRowing. The website does not state explicitly that all alleged emotional and physical misconduct as well as violations of the MAAPP must be reported to USRowing. This does not impact the audit score. This issue is addressed in the Communication and Reporting section of this report.

Requirement Nos. 2(b, c, d, e and g) are satisfied. USRowing provided its written policy which addresses all the corresponding elements listed in Appendix B Section 2.

Requirement No. 2(f) is satisfied. USRowing provided its written policy which addresses how USR will respond to resolve allegations that fall under its jurisdiction and updated its policy during the audit to better address how member clubs should respond to and resolve allegations at the member club level and added more detail regarding its report tracking mechanism.

Requirement No. 3(a) is satisfied. USRowing provided its written policy which includes language stating that USR will not interfere with any Center investigation.

AUDIT AREA: **RESPONSE & RESOLUTION**

Requirement Nos. 3(b) and 3(c) are satisfied. USRowing provided its written policy stating that the Director of Safe Sport will respond to requests from the Center within 72 hours. Testing against this standard was conducted from January 1, 2023, to audit date. Of the 41 requests made by the Center during this time period, two requests were responded to by USRowing outside of the 72-hour timeframe. However, USRowing provided evidence of an email outage that affected the receipt of emails during this timeframe.

Requirement Nos. 4 and 4(a) are satisfied. USRowing provided its written policy for collecting Data of Matters Addressed by the NGB. During the audit, USR updated its written policy for detailing how it will track data internally as well as how it will obtain the data from its member clubs. USRowing will be managing its data internally via its secure spreadsheet (and in the future will be implementing case management software) and collecting data from its member clubs (via a quarterly survey) that USR will submit to the Center. The policy encompasses all elements listed in Appendix B Section 5.

CORRECTIVE ACTIONS:

1. USRowing must update its website with the most current version of the USRowing Safe Sport Policy Manual.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Pamela Adler

DEADLINE: December 21, 2023

CORRECTIVE PLAN:

1. USRowing will update the website with the current version of the USRowing Safe Sport Policy once it has been approved and accepted per the USOPC Audit, expected by December 21, 2023.

AUDIT AREA: **RISK ASSESSMENT**

REQUIREMENTS:

During the Event Audit, the auditor also conducts a MAAPP Risk Assessment, which includes on-site observations, interviews of select individuals at the event and review of policies and procedures relative to the implementation of the 2022 MAAPP Required Prevention Policies. The Assessment focuses on:

1. General Observations
 - a. Event space/Event layout
 - b. Communications to participants
 - c. Credentialing system
2. Required Prevention Policies
 - a. How NGB has attended to the seven (7) prevention policies within the 2022 MAAPP
3. Response and Resolution
 - a. Specific policy items NGB is required to have posted publicly
 - b. How NGB addresses and tracks reports of misconduct that are not in the Center's jurisdiction

This section of the Audit Report details areas observed during the audit that were related to the Risk Assessment and were found to reflect increased risk to athlete safety and well-being.

RATIONALE:

There were no qualifying findings observed during the two-day event audit applicable to this section of the report.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

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
- Failure to identify or track two or more categories of individuals required to be SafeSport trained
- Failure to check against two or more categories of individuals in Organization's Quality Control System at event

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
- Failure to identify or track one or more categories of individuals required to be SafeSport trained
- Failure to check against one category of individuals in the Organization's Quality Control System at event

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
- Adequate tracking and inclusion of all individuals in all required categories in the Organization's Quality Control System at event

- 1) Organization's Response & Resolution standards must be posted on Organization's website no later than January 1, 2023.
- 2) Organization's Internal Response & Resolution Policies and Process:
 - a. **Reporting Mechanism:** The Organization must have a mechanism on their public website (such as a form 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. The mechanism must:
 - i. Have no associated costs, fees, or other financial barriers attached to submitting a report
 - ii. Provide the option to report anonymously
 - iii. Clearly define for end users and provide online reporting mechanisms for the respective jurisdictional authority of the Center and the Organization (i.e., the Center has exclusive jurisdiction over allegations of sexual misconduct) and include a link to the Center's reporting portal (at uscenterforsafesport.org/report-a-concern)
 - b. **Referral of Report to the Center:** Any report received by the Organization of an allegation that falls within the Center's exclusive jurisdiction must be referred by the Organization directly to the Center immediately and no later than within 24 hours.
 - c. **Jurisdiction Notification:** The Organization must promptly inform an identified reporting party of its jurisdictional determination regarding their report to the Organization, communicating that the matter either is being referred to the Center, is being addressed by the Organization, or is being referred to a local affiliated organization.
 - d. **Mandatory Reporting:** The Organization must have a mandatory reporting policy that comports with the mandatory reporting of child abuse provisions in the SafeSport Code, including mandatory reports to law enforcement, compliance with any other applicable reporting requirements under state law, and mandatory reports to the Center.
 - e. **Prohibition of Retaliation:** The Organization must have a policy expressly prohibiting retaliation before, during, and after the process (whether led by the Organization or by the Center) of resolving an abuse or misconduct allegation.
 - f. **Response and Resolution of Reported Allegations:** The Organization must establish a policy that clearly states how the Organization and its local affiliated organizations will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction, as well as those over which the Center declines jurisdiction. It should include:
 - i. A mechanism/system for tracking reported allegations within the Organization's (or its local affiliated organization's) jurisdiction, reflecting how allegations were responded to, and their respective outcomes
 - ii. The designation of a representative at the Organization who ensures the Response and Resolution policy is being followed
 - g. **No Interference:** The Organization shall not interfere in, attempt to interfere in, or attempt to influence the outcome of, any Center investigation.
- 3) **Responsiveness to Requests from the Center:** The Organization must have a designated representative(s) and an established policy to respond to requests from the Center within 72 hours for:
 - a. The eligibility status of a Participant
 - b. The existence of Organization-imposed temporary measures or safety plans

4) Policy to Enforce Sanctions and Temporary Measures:

The Organization must have a Quality Control System meeting U.S. Center for SafeSport standards that prohibits individuals with sanctions or temporary measures (issued by the Center or the Organization) from participating 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.

5) Policy to submit to the Center “Data of Matters Addressed by the Organization”

The Organization must annually submit to the Center data regarding:

- a. Reports of emotional or physical misconduct made to the Organization or its local affiliated organizations
 - i. Total reported incidents of alleged emotional misconduct
 - ii. Total reported incidents of alleged physical misconduct
 - iii. Total number of investigations of alleged emotional misconduct
 - iv. Total number of investigations of alleged physical misconduct
 - v. Total number of violations for emotional misconduct adjudicated by the Organization, separated by cases adjudicated by NGB and cases adjudicated by its LAOs
 - vi. Total number of violations for physical misconduct adjudicated by the Organization, separated by cases adjudicated by NGB and cases adjudicated by its LAOs
- b. Reports to the Organization or its local affiliated organizations that a Participant violated the Minor Athlete Abuse Prevention Policies (MAAPP)
 - i. Total reported incidents of alleged violations of the MAAPP, by policy type
 - ii. Total number of investigations of alleged violations of the MAAPP
 - iii. Total number of violations of the MAAPP, separated by cases adjudicated by NGB and cases adjudicated by its LAO
- c. Reports to the Organization or its local affiliated organization that a Participant engaged in retaliation
 - i. Total reported incidents of alleged retaliation
 - ii. Total number of investigations of alleged retaliation
 - iii. Total number of violations of retaliation policy separated by cases adjudicated by NGB and cases adjudicated by its LAOs