

# 2023 EVENT AUDIT REPORT

AUDIT AND COMPLIANCE  
DEPARTMENT

**NGB NAME:**  
USA Wrestling

**EVENT NAME:**  
2023 Junior National Duals and 14U Nationals

**EVENT SITE:**  
Cox Civic Center

**EVENT DATE:**  
June 13, 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	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 54 individuals randomly selected for testing, 53 (98.15%) were current in their SafeSport training.

Requirement No. 1(b) is satisfied. Of the 7 individuals randomly selected for testing, 7 (100%) were properly included on the USA Wrestling (USAW) list of those at the event required to be SafeSport trained. USA Wrestling requires that all members over 18 years of age, regardless of role, to complete training. These roles include the following categories: USAW staff, adult athletes, coaches, officials, media/vendors, team leaders, mat officials and athletic trainers.

Requirement No. 1(c) is satisfied. Of the 18 staff and board members randomly selected for testing, 17 (94.44%) had current training. USAW had 1 board member that had multiple lapses in training starting in 2018 and his training had expired.

Requirement No. 2 is partially satisfied. USA Wrestling provides parent and Minor Athlete training via their 'minor and parent training' tab on their USA Wrestling website. However, USA Wrestling did not send a direct communication (email or newsletter) to its membership offering parent and Minor Athlete training.

**CORRECTIVE ACTIONS:**

1. USA Wrestling must ensure that all Board members are SafeSport trained by August 8, 2023, regardless of Board activity.
2. USA Wrestling must a) send communication to their membership offering parent and Minor Athlete training regarding prevention and reporting of child abuse b) submit to the Center a copy of the communication and distribution list by August 8, 2023 and c) add to USA Wrestling Safe Sport Program Handbook a written policy for communicating this training to its membership annually (every 12 months).

**MANAGEMENT RESPONSE**

RESPONSIBLE INDIVIDUAL: Kenya Dixon

DEADLINE: August 10, 2023

**CORRECTIVE PLAN:**

1. As of July 31, 2023 all Board members are SafeSport trained. A completed certificate was requested; however, the Safe Sport issued completion code is attached.
2. The USA Wrestling membership year goes from September 1 through the following August 31. On August 12, the membership system closes down until August 21. More importantly, our membership peaks during the first week of October. USA Wrestling will have this communication sent to members by October 4, 2023. The USA Wrestling Safe Sport Handbook has been attached to reflect the update to include this optional training be offered annually. Also, documentation that communicates our membership status has been attached.

## 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:

Implemented

### RATIONALE:

Requirement No. 1(a) is satisfied. On May 24, 2023 USA Wrestling (USAW) sent a communication, that included the MAAPP, via email to their event "delegates" (participants) which included athletes, athlete assistants, coaches, officials, medical staff, media, event staff, event volunteers and vendors.

Requirement No. 1(b) is satisfied. In the May 24, 2023 email, USA Wrestling included a hyperlink to the Center for reporting. However, the link within the communication was a dead link. This communication also included a USAW hyperlink regarding how 'to report misconduct'; this linked to a USAW reporting form. A third hyperlink went to the USAW reporting information page which had a live link to the Center and explicit language that alleged emotional misconduct, physical misconduct, sexual misconduct and violations of the MAAPP Must be reported.

Requirement No. 2 is satisfied. USA Wrestling has a written protocol for communicating to all event participants within the Organization for all sanctioned events their Center-approved Education & Training Policy and Required Prevention Policies as well as the reporting protocol. The reporting protocol language states that 'All Event Organizers must send out SafeSport information, including the MAAPP and how to report MAAPP policy violations and other misconduct'. This written protocol is located within the USA Wrestling Safe Sport Athlete Safety Procedures for Event Organizers (Quality Control System) document.

Requirement No. 3 is satisfied. USA Wrestling provided proof of email communication of their Quality Control System (QCS) sent to all event directors of sanctioned events for the current membership cycle. The communication is sent to each event director after the sanctioned event is approved by USAW through their membership platform. This protocol is not a written policy in the USAW QCS.

### CORRECTIVE ACTIONS:

1. Within their communication sent to event participants for all sanctioned events, USA Wrestling must update their link to the U.S. Center for SafeSport's 'report a concern' page.
2. USA Wrestling must update its policy within their quality control system for communicating the MAAPP and reporting protocols to same-day substitution participants for all sanctioned events, to include language about how to report each of - alleged sexual misconduct, physical misconduct, emotional misconduct and violations of the MAAPP.

## AUDIT AREA: **COMMUNICATION AND REPORTING**

3. USA Wrestling must update its policy within their quality control system to explicitly state that event directors must communicate the “MAAPP and how to report sexual misconduct, emotional misconduct, physical misconduct and violations of the MAAPP” to all event participants.
4. In its Quality Control System, USA Wrestling must update its written policy to state explicitly that same-day participants at all sanctioned events must receive the MAAPP and the reporting protocols for each of: alleged sexual misconduct, emotional misconduct, physical misconduct and violations of the MAAPP.
5. USA Wrestling must update their quality control system (QCS) to include a written policy to communicate the QCS to event directors of all sanctioned events at least every membership cycle.

### **MANAGEMENT RESPONSE**

RESPONSIBLE INDIVIDUAL: Kenya Dixon

DEADLINE: August 10, 2023

#### CORRECTIVE PLAN:

1. The link has been updated.
2. See the attached Athlete Safety Procedures for USA Wrestling Events for updates.
3. See the attached Athlete Safety Procedures for USA Wrestling Events for updates.
4. See the attached Athlete Safety Procedures for USA Wrestling Events for updates.
5. Our policy has been updated to reflect Event Directors will receive QCS immediately after being approved for their requested sanctioned event.

## 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. USA Wrestling (USAW) has a protocol within their Quality Control System (QCS) ensuring that individuals on the Organizational Exclusion List (OEL) are not permitted to participate in any capacity in the USAW event. The policy states 'Event Organizers must ensure that Delegates are NOT on a USA Wrestling or U.S. Center for SafeSport exclusion list (i.e., Suspension (temporary or permanent), or Administrative Hold) (collectively, the "Exclusion List")'. USA Wrestling requires all participants (Delegates) to have a current USA Wrestling membership. Individuals on the OEL are automatically ineligible for membership through the USA Wrestling membership system; this includes individuals on Administrative Holds.

Additionally, if an individual is required to be SafeSport trained and their training is not current, their training column in the membership platform will show a red dot meaning "not current" for that requirement. When this happens, the membership is no longer current and that individual will not be able to register for any sanctioned events until training is completed.

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

Requirement No.2 (b) is satisfied. At this particular event, USA Wrestling did not have any same-day registration. However, USA Wrestling does have a written protocol within their QCS for such circumstances. USAWs policy states 'Follow step 1 for same day Delegate registrations'. Meaning that individuals registering same-day must have a current, valid USAW membership. And, in order to have a current membership, individuals cannot be on the OEL and all individuals over 18 years of age must have current SafeSport training.

Requirement No. 2(c) is satisfied. USA Wrestling ensures oversight procedures are adhered to by having all registration completed through their registration system. USAW also ensures oversight by including within its Quality Control System policy that 'It is the responsibility of each Event Organizer (e.g., organizer, club and/or state association) to monitor and enforce the requirements set forth in these procedures at their respective USA Wrestling sanctioned event, to include local, state, regional, national, and international events'.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

**CORRECTIVE ACTIONS:**

No Corrective Actions required.

**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. USA Wrestling (USAW) had its Response and Resolution standards posted on their website by January 1, 2023 (on December 21, 2022).

Requirement No. 2(a) is satisfied. The ‘How To Report Misconduct’ page on the USA Wrestling website has a direct link to the Center’s ‘How to report’ page as well as the Center’s direct phone number for ‘all reports of sexual abuse and child abuse within the U.S. Olympic and Paralympic Movement’. The USAW web page states: ‘The Center also accepts reports of emotional and physical misconduct (including but not limited to bullying, hazing, stalking, and harassment)’. Additionally, the web page states: ‘Reports of emotional and physical misconduct can also be reported directly to your sport’s national governing body (NGB)’ and lists a hyperlink that goes to the USAW membership system’s ‘report misconduct’ page.

Requirement Nos. 2(b, c, d, e) are satisfied.

Requirement No. 2(f) is satisfied. USA Wrestling has a policy that clearly details how USA Wrestling will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction. The policy explicitly identifies the Safe Sport & Compliance Manager as the representative at USA Wrestling who ensures the Response and Resolution policy is being followed. And USA Wrestling showed proof of a tracking system (Excel spreadsheet) for reported allegations.

Requirement No. 2(g) is satisfied.

Requirement No. 3(a) is satisfied. USA Wrestling’s Response and Resolution policy states that ‘USA Wrestling will not interfere in, attempt to interfere in, or attempt to influence the outcome of, any Center investigation’.



## AUDIT AREA: **RESPONSE & RESOLUTION**

Requirement No. 3(b) is satisfied. The USA Wrestling Response and Resolution policy states that all requests from the Center will be responded to within 72 hours. Testing against this standard was conducted for requests made by the Center between January 1, 2023 and the audit date. Of the 133 requests made during this time period, 122 (91.7%) were responded to by USAW within 72 hours.

Requirement No. 3(c) is satisfied. Within USA Wrestling's Response and Resolution Policy, USAW states that the Safe Sport & Compliance Manager is responsible for responding to all requests for information from the Center.

Requirement No. 4 is satisfied. USA Wrestling has a written policy within their Response and Resolution policy for collecting Data of Matters Addressed by the Organization, encompassing all elements listed in Appendix B Section 5. This policy also includes USAW's protocol to collect such data from LAOs however, the protocol language does not explicitly state how LAOs submit reports to the Center or to the NGB.

### **CORRECTIVE ACTIONS:**

1. USA Wrestling must update its policy to state that when LOAs receive a report of misconduct they are to immediately send that information to USAW. This includes allegations of sexual misconduct. USAW stated that LAOs are not conducting investigations, per their protocol.
2. USA Wrestling must update its Data of Matters section in their Response and Resolution policy to include how their LAOs will submit reports to the Center and to the NGB.
3. USA Wrestling must update its tracking spreadsheet to explicitly state how reports are responded to and their respective outcomes when the Center declines jurisdiction.

### **MANAGEMENT RESPONSE**

RESPONSIBLE INDIVIDUAL: Kenya Dixon

DEADLINE: August 10, 2023

#### **CORRECTIVE PLAN:**

1. This has been updated. See the attached Response and Resolution Policy for updates.
2. This has been updated. See the attached Response and Resolution Policy for updates.
3. See attached sample spreadsheet for updates.

## 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](https://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