

2023 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB NAME:
USA Golf

AUDIT SITE:
Virtual

AUDIT DATE:
September 19, 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 Administrative Audit Standards articulated in the Audit and Compliance Manual.

The audit covered the following areas:

- > EDUCATION AND TRAINING
- > COMMUNICATION AND REPORTING
- > QUALITY CONTROL
- > LOCAL AFFILIATED ORGANIZATIONS
- > RESPONSE & RESOLUTION

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

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	NOT APPLICABLE
RESPONSE & RESOLUTION	IMPLEMENTED

AUDIT AREA: EDUCATION AND TRAINING

REQUIREMENTS:

1. Identify and track all Adult Participants in the organization required to annually (every 12 months) complete U.S. Center for 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.
2. Mark any Adult Participant who has not completed the required training in the Organization's 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 with or authority over amateur athletes who are minors.
3. Staff and board members must have current training and be trained annually (every 12 months) regardless of participation or activity.
4. 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:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Golf (USAG) provided a list of all Adult Participants required to annually complete SafeSport training. USAG requires the following roles to be trained: USAG staff and USAG board. Of the 3 individuals randomly selected for testing, 3 (100%) were properly included on the list that USAG provided to the Center.

Requirement No. 2 is satisfied. The individual randomly selected for testing was current with their SafeSport training.

Requirement No.3 is satisfied. Of the 4 staff and board randomly selected for testing, 4 (100%) had properly completed training. However, two board members had lapsed training in 2022 and 1 staff member lapsed in training in 2023. SafeSport training is required annually for all board and staff regardless of whether they have regular contact with or authority over Minor Athletes.

Requirement No. 4 is not applicable. USAG does not have Minor Athletes therefore USAG does not offer annual Minor Athlete or parent training.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **COMMUNICATION AND REPORTING**

REQUIREMENTS:

1. Provide direct communication of the Organization's 2022 MAAPP (to include the Education and Training Policy and Required Prevention Policies) to all members and Adult Participants within current membership cycle.
2. 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.
3. Provide direct communication of the reporting mechanism in requirement #2 (separate from link to Organization's full Athlete Safety policy) to all members and Adult Participants within current membership cycle.
4. Provide proof of communication of the Quality Control System to all event directors of sanctioned events within current membership cycle.

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Golf (USAG) provided a direct communication of their MAAPP sent to all Adult Participants via email on September 28, 2023.

Requirement No. 2 is satisfied.

Requirement No. 3 is satisfied. USA Golf provided a direct communication of their reporting protocol sent to all Adult Participants via email on September 28, 2023.

Requirement No. 4 is satisfied. USA Golf does not operate, own or sanction events therefore USAG does not currently have event directors that would be sent the Quality Control System. However, USAG does have a written protocol stating that the Quality Control System policy must be provided to event organizers (which would be USAG staff) should USAG ever operate, own or sanction an event.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

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/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 Golf (USAG) does not operate, own or sanction events. USAG's Quality Control System (QCS) states that, should there be a USAG sanctioned event, individuals on the Organizational Exclusion List (OEL) are unable to participate and individuals who are required to be but are not SafeSport trained will be prevented from participation.

Requirements Nos. 2 (a-c) are not applicable. USAG does not operate, own, or sanction events therefore does not have one-day/short-term memberships, last-minute substitutions or day-of registrants.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **LOCAL AFFILIATED ORGANIZATIONS**

REQUIREMENTS:

1. Organization must provide direct communication of the Organization's 2022 MAAPP (to include the Education & Training Policy and Required Prevention Policies) sent to all LAO members, staff and board by email or newsletter, within the Organization's current membership cycle.

SCORE:

Not Applicable

RATIONALE:

Not Applicable. USA Golf has certified with the Center that they do not have Local Affiliated Organizations.

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 Golf (USAG) did provide proof of its Response and Resolution (R&R) standards being posted on their website by January 1, 2023 (on December 29, 2022). However, it was confirmed by the Center that only part of the USAG policy was posted by December 29, 2022. As of audit date, the full Response and Resolution standards were posted.

Requirement No. 2(a) is satisfied. The Safe Sport and Reporting page on the USA Golf website has a direct link to the Center for reporting all 'all reports of sexual abuse and child abuse within the U.S. Olympic and Paralympic Movement' as well as 'reports of emotional and physical misconduct (including but not limited to bullying, hazing, stalking, and harassment) within the U.S. Olympic and Paralympic Movement'. The page also states that emotional misconduct, physical misconduct and violations of the MAAPP can also be reported directly to USAG. Also - the reporting page does allow for individuals to report anonymously to the Center. And the website page clearly defines respective jurisdictional authority of the Center and USA Golf.

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

Requirement No. 2(f) is satisfied. USA Golf's policy clearly states how USAG will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction. USA Golf has a tracking system (Excel spreadsheet) that includes: allegations, date of incident, date allegation reported, reporter, potential witness, type of misconduct, USAG response, date report submitted to the center for Safe Sport, case status, resolution. USA Golf's policy states that the Executive Director is the designated representative responsible for ensuring that the Response and Resolution policy is followed.

AUDIT AREA: **RESPONSE & RESOLUTION**

Requirement No. 3(a) is satisfied. USA Golf's Response and Resolution Policy states that 'USA Golf will not interfere in, attempt to interfere in, or attempt to influence the outcome of any U.S. Center for SafeSport investigation'.

Requirement No. 3(b) is satisfied. USA Golf's Response and Resolution policy states that all requests from the Center will be responded to within 72 hours. Auditor reviewed findings of this standard that occurred between January 1, 2023 to audit date. For the one request made from the Center to USAG during this time period, USAG had a justified explanation for their response being beyond 72 hours.

Requirement No. 3(c) is satisfied. Within USA Golf's Response and Resolution policy, it states that the USAG Executive Director is responsible for responding to all requests from the Center.

Requirement No. 4 is satisfied. Within their Response and Resolution policy, USA Golf has a written policy for collecting Data of Matters Addressed by the Organization, encompassing all elements listed in Appendix B Section 5. The policy states that 'USA Golf's legal counsel maintains a Complaint Tracking schedule in Excel of all reports made; to include emotional or physical misconduct, MAAPP violations, and reports of retaliation. USA Golf manages all reports of emotional and physical misconduct, MAAPP violations, and reports of retaliation'.

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:
 - a. 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”
 - a. The Organization must annually submit to the Center data regarding:
 - b. 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
 - c. 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
 - d. 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