

2023 EVENT AUDIT REPORT

AUDIT AND COMPLIANCE
DEPARTMENT

NGB NAME:
USA Gymnastics

EVENT NAME:
2023 USA Gymnastics Championships

EVENT SITE:
SAP Center & San Jose Convention Center

EVENT DATE:
August 24, 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	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:

Implemented

RATIONALE:

Requirement No. 1(a) is satisfied. Of the 53 individuals randomly selected for testing, 53 (100%) had completed the Center's training requirements within the previous 12 months prior to the event.

Requirement No. 1(b) is satisfied. Of the 10 individuals randomly selected for testing, 10 (100%) were properly included on the list provided to the Center of individuals required to complete the Center's training requirements. All categories of individuals required to be trained for the event were checked for training. The categories included coaches, officials, athletes, medical, staff, committee members, and specific volunteers.

Requirement No. 1(c) is satisfied. Of the 21 board and staff members randomly selected for testing, 21 (100%) had current training.

Requirement No. 2 is satisfied. USA Gymnastics provided evidence of multiple emailed newsletters which offered the Center's prevention and reporting of child abuse training to Minor Athletes and parents via the following newsletters:

Within the parents' newsletter sent in March, May, June, July, August, September, October, November, and December 2022; and January, February, April, and May 2023.

Within the membership newsletter sent in March, May, June, July, August, September, October, November, and December 2022; and January, February, March, April, and May 2023.

Within the member club newsletter in March, April, May, June, July, August, and December 2022; and January, February, March, April, May, and August 2023.

USAG also offered alternative resources and training on child abuse and prevention within the safety champions newsletters emailed in May, September, October, and December 2022; and March and April 2023.

AUDIT AREA: **EDUCATION AND 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. 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 Nos. 1(a) and (b) are satisfied. USA Gymnastics ("USAG") communicated the MAAPP and protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP prior to the event to all event participants in a variety of methods. Most event participants are USAG members, and the USAG member event participants received at least one or more of the below listed monthly newsletters, depending on their role with USAG. The newsletters included the MAAPP and protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

- Monthly newsletters to all USAG members from August 2021 - May 2023 (USAG members includes athletes, club owners/admins, coaches, judges, medical, meet directors, photographers, USAG staff/board, and volunteers).
- Monthly newsletters to all meet directors from August 2021 - May 2023.
- Monthly newsletters to member club owners and administrators from August 2021 - May 2023.
- Monthly newsletters to parents of Minor Athletes from August 2021 - May 2023.
- Monthly newsletters to club owners, administrators, and safety Champions from August 2021 - May 2023.
- Monthly Newsletters to trampoline and tumbling from August 2021 - May 2023.
- Within the athlete membership card and membership agreements.

Upon credential check-in, all member and non-member event participants were required to scan a QR code which directed users to the "Event Mandate" document. The document included the MAAPP requirements and protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

Requirement No. 2 is satisfied. USAG provided its written protocol for communicating the MAAPP and reporting protocol for reporting all forms of misconduct and MAAPP violations via email to all event participants. The written policy states that "Event Participants must receive or be given access to the USA Gymnastics Safe Sport Policy Event Mandate, the Minor Athlete Abuse Prevention Policy, and information on how to report misconduct, prior to participating in the event. To meet the mandate, USA Gymnastics will include this information in monthly newsletters for both professional members and parents of minor athletes several times throughout the competitive season. It is also included as a part of the USA Gymnastics membership agreements. It is the Event Director's responsibility to

AUDIT AREA: **COMMUNICATION AND REPORTING**

(Requirement No. 2 continued) provide this information to all non-member and/or day-of Participants including but not limited to, volunteers and professionals whose job functions include medical care, photography, and security and who were not previously registered or are not active members of USA Gymnastics.” The written policy includes a link to the “Event Mandate” document which is described above. The written policy and protocol were followed for this audited event.

Requirement No. 3 is satisfied. USAG provided documentation that the Quality Control System policies (Safe Sport Protocol for Sanctioned and Premier Events) were communicated to event organizers through the monthly meet director newsletters. USAG provided documentation of the newsletters sent from August 2021 through May 2023. Within these newsletters, USAG offered additional resources including checklists, a recorded training webinar covering the SafeSport related policies and protocols for events, links to USAG’s Permanently Ineligible and Suspended/Restricted persons lists, event signage, checklists, scripts for announcers, meet reservation guides, FAQs, and more.

In addition to the monthly newsletters, after the event sanction is approved, an automated email is sent to the meet director which gives them access to all the above-described policies and resources.

USAG communicated the Safe Sport Protocol for Sanctioned and Premier Events to the events team responsible for the audited event on August 7, 2023.

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 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 Gymnastics' Quality Control System ("QCS") includes a protocol for event directors to utilize USAG's meet registration system to verify SafeSport training completions and to ensure that an individual has not been banned and/or suspended by USAG or the Center. For any event participant not able to be entered into the meet registration system such as venue staff, volunteers, medical and other event staff, the protocol requires that an event director obtain proof of valid SafeSport training and check USAG's Organizational Exclusion List manually. The Organization Exclusion list is provided to event directors within the QCS. This protocol was followed at the audited event.

Requirement No. 2 (a) is not applicable. USAG does not allow for any short-term memberships.

Requirement No. 2 (b) is satisfied. The QCS protocols also encompass processes for on-site, day-of and/or last-minute participation/registration.

Requirement No. 2 (c) is satisfied. USAG's oversight protocol includes the requirement for all sanctioned event registration to be completed within its meet registration system to ensure that athletes and coaches have met all the SafeSport related requirements. USAG requires that each event must be approved through an online event sanctioning application. Within the application, the meet director verifies that they will follow all USAG rules and policies including the Safe Sport policies. 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 of a sanction. USAG stated that staff reviews every submission from an event director to look for any issues or discrepancies.

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. USAG provided its Response and Resolution policies.

Requirement No. 2 is satisfied. USAG posted to its public website the Center-specific Response & Resolution policies by the January 1, 2023, deadline (on December 31, 2022).

Requirement Nos. 2(a-g) are satisfied. USAG provided its written policy which addresses all the corresponding elements listed in Appendix B Section 2.

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

Requirement Nos. 3(b) and 3(c) are satisfied. USAG provided its written policy stating that the USAG Chief Legal Officer, or designee, will respond to requests from the Center within 72 hours. Auditor reviewed findings of this standard that occurred between January 1, 2023, to audit date. Of the 205 requests made from the Center during this time period, 193 were responded to within 72 hours.

Requirement No. 4 is satisfied. USAG provided its written policy for collecting Data of Matters Addressed by USAG, and it encompasses all elements listed in Appendix B Section 5. During the audit, USAG updated its policy to state that USAG will be managing the data within its internal case management system.

Requirement No. 4(a) is not applicable as USAG does not allow Local Affiliated Organizations to respond to or resolve allegations. All reports of allegations are reported to and resolved by USAG directly. LAOs must report all allegations of sexual misconduct to the Center and to law enforcement and physical misconduct, emotional misconduct, and violations of the MAAPP to USAG.

AUDIT AREA: **RESPONSE & RESOLUTION**

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

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 one-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