

2024 EVENT AUDIT REPORT

NGB NAME:	U.S. Bowling Congress
EVENT SITE:	Austell, GA
EVENT DATE:	February 2, 2024

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 2024 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

AUDIT AREA: EDUCATION AND TRAINING

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 a copy of a direct communication (email or newsletter), sent to all Adult Participants 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. The testing of individuals randomly selected in the below Requirement Nos. 1(a),1(b), and 1(c), revealed an average of 100%.

Requirement No. 1(a) is satisfied. Of the 7 individuals randomly selected for testing, 7 (100%) properly completed the Center's training within the previous 12 months, prior to the event.

Requirement No. 1(b) is satisfied. Of the 6 individuals randomly selected for testing, 6 (100%) were properly included in, or excluded from, the list of individuals who were required to be SafeSport Trained. One individual properly excluded from the list was a U.S Bowling Congress (USBC) Registered Volunteer Program (RVP)-certified individual with an RVP credential (meaning he had at a minimum, current SafeSport Training and approved background check) who was not participating as a coach or team contact, but was at the event as a spectator.

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

Requirement No. 2 is satisfied. U.S. Bowling Congress provided evidence that on August 14, 2023, the Center's training for parents and Minor Athletes was offered to its entire membership via newsletter. This newsletter was sent within 12 months of the previous newsletter sent to membership that also offered the Center's training for parents and Minor Athletes.

CORRECTIVE ACTIONS: No Corrective Action required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is required.

AUDIT AREA: COMMUNICATION AND REPORTING

REQUIREMENTS:

1. Organization or Event Director must provide a 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:
 - a. must include MAAPP requirements (either full policy or summary)
 - b. must also detail reporting protocols and explicitly state how to report each of: suspected sexual misconduct, emotional misconduct, physical misconduct and violations of the MAAPP
2. Provide Organization's written protocol for communicating - to all participants within the Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization - the Center-approved MAAPP and reporting protocols for all concerns involving suspected 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 all of the Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization.

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No. 1 is satisfied. U.S. Bowling Congress (USBC) provided evidence that a direct communication of the USBC Athlete Safety/Registered Volunteer Program (RVP) Handbook (which includes the USBC MAAPP policies and reporting protocols for alleged sexual misconduct, physical misconduct, and emotional misconduct) was communicated to coaches, volunteers, and contractors. USBC provided documentation that the Athlete Safety/RVP Handbook was mailed to all Minor Athlete bowlers when they become members of USBC. However, Minor Athletes did not receive the communications within 30 days before the event, which is stated policy in the USBC quality control document.

Requirement No. 2 is satisfied. USBC has a written protocol that requires event management to send all event participants an email communication, within 30 days of the event, of USBC's Athlete Safety and RVP Handbook. While the Athlete Safety and RVP Handbook contains the MAAPP and detailed reporting protocols for alleged sexual, physical, and emotional misconduct, and MAAPP violations, the written protocol does not require that the communication include explicit language about which concerns can be reported (alleged physical misconduct, emotional misconduct, sexual misconduct, or violations of the MAAPP). Additionally, the policy states any individual that registers day-of will be instructed to review signage by the event director. The policy requires that signage with a QR Code which links participants to the Athlete Safety/RVP Handbook (which include the MAAPP and reporting protocols for alleged sexual, physical, and emotional misconduct, and MAAPP violations) should be on site.

Requirement No. 3 is satisfied. USBC certifies sanctioned events on an ongoing basis. Once a tournament is certified, USBC sends an email confirmation to tournament managers notifying them of the policies and protocols required to conduct a USBC sanction event, including a link to the USBC Quality Control Policy.

CORRECTIVE ACTIONS:

1. U.S Bowling Congress must update its written communication protocol, found in the external quality control system policy, to include explicit mention of which violations may be reported (i.e., alleged physical misconduct, emotional misconduct, sexual misconduct, or violations of the MAAPP) and how they can be reported.
2. USBC must either a) update the language in their current policy to state that all event participants at all sanctioned events must receive the MAAPP and reporting protocols prior to each event or b) add protocols to their current policy to ensure that all participants at all sanctioned events receive the MAAPP and reporting protocols within 30 days of each sanctioned event.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: U.S. Bowling Congress staff

DEADLINE: April 3, 2024

CORRECTIVE PLAN: USBC will make these corrections.

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 (OEL) 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 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 participant registration/substitutions (athletes, staff, volunteers, vendors, coaches, officials etc.)
 - c. Oversight procedures by the Organization when the staff is not on site at events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No.1 is partially satisfied. The U.S. Bowling Congress (USBC) implement an internal, 'back-end' Quality Control System (QCS) policy at all events to ensure that individuals on the U.S. Bowling Congress Organizational Exclusion List (OEL) cannot participate. U.S. Bowling Congress has a back-end database, Bowl.com, that automates this process within its membership and tournament management system. Any individual included on the U.S. Bowling Congress OEL cannot complete membership registration or become a registered volunteer (an adult member who works with USBC youth bowlers). Therefore, any individual who has been banned, suspended, or is placed on an Administrative Hold will not show up on the 'Find-a-member' feature (the membership database publicly posted to the USBC website).

The external quality control policy – which is followed by event managers within the NGB, is implemented at all sanctioned events by NGB staff in collaboration with event managers, uses the internal policy functionality to ensure compliance and requires that event managers verify all participants are members by checking the 'Find-a-member' feature on Bowl.com. If an individual is not found, they are prevented from participating in any U.S. Bowling Congress sanctioned event. The external QCS policy for event managers also requires checking the Center's Centralized Disciplinary Database to confirm that non-member event participants are not included on the Center's exclusion list. The external quality control policy has a written protocol to notify the Center if anyone placed on an Administrative Hold tries to participate. Additionally, the U.S. Bowling Congress states that their rules and compliance department is responsible for notifying the Center if a person with an Administrative Hold attempts to participate.

This process requires that event managers direct anyone without a membership to obtain a membership prior to participating. U.S. Bowling Congress stated that if the individual attempting to obtain a membership is banned, suspended or placed on an Administrative Hold, then that the person is directed to contact the USBC Rules and Compliance Department for further assistance and if the individual has an Administrative Hold, the Rules and Compliance Department will notify the Center immediately.

U.S. Bowling Congress has a process to send a direct email communication to local associations informing the local association of a suspended individual. Additionally, local associations also can check members' status by using the 'Find a member' feature and, additionally, can use USBC's 'suspended bowler list' - a password-protected database of individuals who have been banned, suspended or placed on an Administrative Hold. However, at the time of the audit, the list was not current with the Center's adjudication log. Auditor discovered that many individuals with an Administrative Hold or those who were banned or suspended were not found on the 'suspended bowler' list. U.S. Bowling Congress stated this issue was due to a back-end process error but would work to immediately remedy the issue.

The U.S. Bowling Congress and its tournament managers also implement a QCS policy at all events to prevent participation for individuals who are required to be SafeSport trained but are not. The U.S. Bowling Congress membership and tournament management system, Bowl.com, tracks SafeSport training using an automated back-end process. An individual's membership record will be noted in the system to have current SafeSport Training. If membership information does not show current SafeSport training, that individual cannot participate in the event.

Requirement Nos. 2a and c are not applicable as U.S. Bowling Congress does not have one-day/ short-term membership and USBC states that they have staff on site for all U.S Bowling Congress sanctioned events.

Requirement No. 2b is satisfied. U.S. Bowling Congress has a written protocol pertaining to day-of registration. All day-of registrants are verified by the U.S Bowling Congress event managers to have valid membership. Any day-of registrant who is included on the OEL will not show in the U.S. Bowling Congress membership database, Bowl.com, nor the public 'find-a-member' list. Any day-of registrant who is required to be SafeSport Trained will be noted in the system to have current SafeSport Training. If membership information does not show current SafeSport training for an individual required to be SafeSport trained, that individual cannot participate in the event.

CORRECTIVE ACTIONS:

1. The U.S. Bowling Congress must update its internal or external quality control policy to include a policy and attending protocols ensuring that the U.S. Bowling Congress rules and compliance department will notify the Center if individuals who have been placed on Administrative Hold attempt to participate.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Mike Spridco

DEADLINE: April 3, 2024

CORRECTIVE PLAN: USBC will make these corrections.

AUDIT AREA: RESPONSE AND RESOLUTION

REQUIREMENTS:

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. 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. Requests from the Center are responded to within 72 hours
 - b. 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 and annually submitting to the Center, 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 and submit to the Center such data from LAOs, if applicable

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No.1 is satisfied. U.S. Bowling Congress (USBC) provided the Center its Response and Resolution Policies and proof that the policies were posted to the U.S. Bowling Congress website.

Requirement No.2a is satisfied.

Requirement Nos. 2b, c, d, e, f and g are satisfied. U.S. Bowling Congress provided its written policy in which these items are addressed in accordance with the requirements found in Appendix B, Section 2. The written policy that satisfies the requirements may be found in the 'USBC Bylaws Supplement' document. USBC also provided proof of a mechanism (a system) used to track items addressed in accordance with the requirement found in Appendix B, Section 2.f.i. Additionally, the USBC Director of Rules and Compliance is responsible for ensuring the investigation is conducted.

Requirement Nos. 3a and b are satisfied. U.S. Bowling Congress has a policy that requires the USBC Director of Rules and Compliance or other designated representative to be responsible for responding to all requests for information from the Center within 72 hours. Auditor reviewed findings of this standard that occurred between USBC’s 2023 audit and this audit date. Of the 30 requests made from the Center during this time period, 29 were responded to within 72 hours.

Requirement No. 4 is satisfied. U.S. Bowling Congress has a policy within their Athlete Safety/RVP Handbook to submit to the Center “Data of Matters Addressed by the Organization” which encompasses all elements listed in Appendix B, Section 5. U.S. Bowling Congress does not allow their Local Affiliated Organizations (LAOs) to accept nor adjudicate reports, as USBC requires all reports to be made directly to the U.S. Center for SafeSport or to the U.S. Bowling Congress.

CORRECTIVE ACTIONS: No Corrective Action is required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is 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 could include items that were found to reflect increased or mitigated risk to athlete safety and well-being.

RATIONALE:

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

CORRECTIVE ACTIONS: No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is required.

APPENDIX A: SCORING GUIDE

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
- Failure to identify or track two or more categories of individuals required to be trained
- Failure to check against two or more categories of individuals in Organization's Quality Control System at an event
- Less than 70% compliance on Education & Training requirements

PARTIALLY IMPLEMENTED

A finding of this type indicates a moderate reduction in risk to Minor Athletes and reveals what is determined to be a limited environment of safety and well-being for Minor Athletes. This can result from, but is not limited to, the following:

- Presence of policies but missing relevant and supporting documentation
- Presence of policies that do not meet the mandatory minimum requirements of the MAAPP
- Not adequately or consistently providing communication to Adult Participants regarding policy/requirements
- Lack of an adequate reporting and oversight structure for Required Prevention Policy violations
- Failure to identify one or more categories of individuals required to be trained
- Failure to check against one category of individuals in the Organization's Quality Control System at an event
- Above 70% and below 90% compliance on Education & Training requirements

IMPLEMENTED

A finding of this type indicates a significant reduction in risk to Minor Athletes and reveals what is determined to be a satisfactory environment of safety and well-being for Minor Athletes. This can result from, but is not limited to, the following:

- Presence of policies and all relevant and supporting documentation provided where required
- Adequate and consistent communication to Adult Participants
- Adequate reporting and oversight structure for Required Prevention Policy violations
- Adequate tracking and inclusion of all individuals in all required categories in the Organization's Quality Control System at event
- 90% or higher compliance on Education & Training requirements

APPENDIX B: RESPONSE AND RESOLUTION STANDARDS

- 1) Organization's Response & Resolution standards must be posted on Organization's website.
- 2) Organization's Internal Response & Resolution Policies and Process:
 - a. Reporting Mechanism: The Organization must have a mechanism on its public website (such as a form or contact info for an athlete safety liaison) enabling individuals to report all concerns involving suspected 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 LAOs 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 LAO's) jurisdiction, reflecting how allegations were responded to, and their respective outcome
 - 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 LAOs
 - 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 LAOs 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 LAOs
- 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