



COMPLIANCE AND AUDIT DIVISION U.S. CENTER FOR SAFESPORT

U.S. Figure Skating

AUDIT REPORT

September 10, 2019

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (hereinafter “the Center”) is committed to building a sport community where participants can work and learn together in an atmosphere free of emotional, physical, and sexual misconduct. Federal law authorized the Center to develop training to prevent abuse and policies and procedures for implementation by National Governing Bodies (NGBs) and Paralympic Sports Organizations to prevent abuse. [See Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017 \(S.534\).](#)

In accordance with S.534, the Center has been granted authority to complete regular and random audits of the NGBs recognized by the U.S. Olympic & Paralympic Committee. The Center will objectively evaluate adherence and level of compliance to the requirements set forth in the [U.S. Center for SafeSport Code](#) and the [Minor Athlete Abuse Prevention Policies](#) (hereinafter “the MAAPP”), including both the Education and Training Policy and the Required Prevention Policies. Additionally, the audit examined any areas of potential improvement or inconsistencies in order to propose corrective or proactive/improvement actions.

AUDIT SCOPE

The scope of this audit is based on the Education and Training Policy and the Required Prevention Policies of the MAAPP released January 23, 2019. The requirements for each section of the audit are explained in the MAAPP Implementation Guide released May 23, 2019, included in Appendix C.

The audit covered the following areas:

- Education and Training
- Required Prevention Policies
 - ✓ One-on-One Interactions
 - ✓ Massage and Rubdowns/Athletic Training Modalities
 - ✓ Locker Rooms and Changing Areas
 - ✓ Social Media and Electronic Communications
 - ✓ Local Travel
 - ✓ Team Travel
- Appendix A contains recommendations for items that were not scored in the 2019 audit but could be scored in future audits.

AUDIT METHODOLOGY

The Center reviewed policies and procedures relative to the MAAPP and all other policies and bylaws pertaining to Athlete Safety.

The Center requested and received additional information and sought clarification during the audit through meetings with various individuals responsible for compliance with the Center’s requirements.

Upon completion of the Audit, each area was scored in accordance with the scoring guidelines included in Appendix B.

AUDIT PARTICIPANTS

The following is a listing of all personnel from the NGB who were present and/or participated in the meetings, interviews and assessment.

1. David Raith
2. John Anderson
3. Patricia St. Peter
4. Kelly Vogtner
5. Barbara Reichert
6. Shelbi Meyer
7. Denise Kay
8. Cassy Papajohn

AUDIT SUMMARY

Based on the audit methodology performed, the Center made findings as to whether the requirements identified in the MAAPP and explained in detail in Appendix C were implemented for both the Education & Training Policy and each of the six Required prevention Policies. Each of the seven areas were scored as follows: Fully Implemented, Partially Implemented, or Not Implemented. The scoring guide, explaining in detail the requirements to meet each score can be found in Appendix B. A summary of the audit scores can be found below, with more detailed explanations found in Section 6.

Policy	Audit Score
Education & Training	Fully Implemented
One-on-One Interactions	Fully Implemented
Massage and Rubdown/Athlete Training Modalities	Fully Implemented
Locker Room and Changing Areas	Fully Implemented
Social Media & Electronic Communications	Fully Implemented
Local Travel	Fully Implemented
Team Travel	Fully Implemented

AUDIT FINDINGS AND RATIONALE

Education and Training

REQUIREMENTS

1. Identified all Adults required to complete the Center's training in one database / spreadsheet and provided list to the Center.
2. All Adults required to complete training have done so according to the deadline.
3. Education and Training Policy is posted on website.
4. Communicated Education and Training Policy directly with all adults required to complete training on at least one occasion via any of the following methods: email, newsletter, webinar, and/or social media.
5. Offered and gave (with parental consent) training to minor athletes. Provided the Center with a description of the training and how it was offered and the date the training was offered.

SCORE

Fully Implemented

RATIONALE

U.S. Figure Skating (USFSA) satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

One-on-One Interactions

REQUIREMENTS

1. Identified all Applicable Adults in organization required to follow the One-on-One Interactions Policy.
2. Tracked all above Applicable Adults in a database or spreadsheet and provided list to the Center.
3. One-On-One Interactions Policy is posted on website.
4. Communicated the One-On-One Interactions Policy directly to Applicable Adults covered by the policy on at least one occasion via any of the following methods: email, newsletter, webinar, and/or social media.
5. Established a reporting policy by which violations of this policy can be communicated to the appropriate party.
6. Communicated the reporting policy for violations directly to all Applicable Adults via any of the following methods: email, newsletter, webinar, and/or social media.

SCORE

Fully Implemented

RATIONALE

USFSA satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

Massage and Rubdowns/Athletic Training Modalities

REQUIREMENTS

1. Identified all Applicable Adults in organization required to follow the Massages and Rubdowns/Athletic Training Modalities Policy.
2. Tracked all above Applicable Adults in a database or spreadsheet and provided list to the Center.
3. Massage and Rubdowns/Athletic Training Modalities Policy is posted on website.
4. Communicated the Massage and Rubdowns/Athletic Training Modalities Policy directly to Applicable Adults covered by the policy on at least one occasion via any of the following methods: email, newsletter, webinar, and/or social media.
5. Established a reporting policy by which violations of this policy can be communicated to the appropriate party.
6. Communicated the reporting policy for violations directly to all Applicable Adults via any of the following methods: email, newsletter, webinar, and/or social media.

SCORE

Fully Implemented

RATIONALE

USFSA satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

Locker Room and Changing Areas

REQUIREMENTS

1. Identified all Applicable Adults in organization required to follow the Locker Room and Changing Areas Policy.
2. Tracked all above Applicable Adults in a database or spreadsheet and provided list to the Center.
3. Locker Room and Changing Areas Policy is posted on website.
4. Communicated the Locker Room and Changing Areas Policy directly to Applicable Adults covered by the policy on at least one occasion via any of the following methods: email, newsletter, webinar, and/ or social media.
5. Established a reporting policy by which violations of this policy can be communicated to the appropriate party.
6. Communicated the reporting policy for violations directly to all Applicable Adults via any of the following methods: email, newsletter, webinar, and/or social media.

SCORE

Fully Implemented

RATIONALE

USFSA satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

Social Media & Electronic Communications

REQUIREMENTS

1. Identified all Applicable Adults in organization required to follow the Social Media & Electronic Communications Policy.
2. Tracked all above Applicable Adults in a database or spreadsheet and provided list to the Center.
3. Social Media & Electronic Communications Policy is posted on website.
4. Communicated the Social Media & Electronic Communications Policy directly to Applicable Adults covered by the policy on at least one occasion via any of the following methods: email, newsletter, webinar, and/or social media.
5. Established a reporting policy by which violations of this policy can be communicated to the appropriate party.
6. Communicated the reporting policy for violations directly to all Applicable Adults via any of the following methods: email, newsletter, webinar, and/or social media.

SCORE

Fully Implemented

RATIONALE

USFSA satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

Local Travel

REQUIREMENTS

1. Identified all Applicable Adults in organization required to follow the Local Travel Policy.
2. Tracked all above Applicable Adults in a database or spreadsheet and provided list to the Center.
3. Local Travel Policy is posted on website.
4. Communicated the Local Travel Policy directly to Applicable Adults covered by the policy on at least one occasion via any of the following methods: email, newsletter, webinar, and/or social media.
5. Established a reporting policy by which violations of this policy can be communicated to the appropriate party.
6. Communicated the reporting policy for violations directly to all Applicable Adults via any of the following methods: email, newsletter, webinar, and/or social media.

SCORE

Fully Implemented

RATIONALE

USFSA satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

Team Travel

REQUIREMENTS

1. Identified all Applicable Adults in organization required to follow the Team Travel Policy.
2. Tracked all above Applicable Adults in a database or spreadsheet and provided list to the Center.
3. Team Travel Policy is posted on website.
4. Communicated the Team Travel Policy directly to Applicable Adults covered by the policy on at least one occasion via any of the following methods: email, newsletter, webinar, and/or social media.
5. Established a reporting policy by which violations of this policy can be communicated to the appropriate party.
6. Communicated the reporting policy for violations directly to all Applicable Adults via any of the following methods: email, newsletter, webinar, and/or social media.

SCORE

Fully Implemented

RATIONALE

USFSA satisfied all requirements in this section.

CORRECTIVE ACTION

No corrective action necessary.

MANAGEMENT RESPONSE

No management response required.

REVIEW OF FUTURE AUDIT REQUIREMENTS

This section will be used to identify issue areas that were not scored in the 2019 audit but will be scored in future audits. U.S. Figure Skating (USFSA) should promptly address the findings noted below to avoid corrective actions in upcoming audits.

- USFSA has internal protocols that it follows for responding to participant status/temporary measures requests from the U.S. Center for SafeSport but no formal written procedure. USFSA needs to create a written policy/protocol/procedure that identifies the process owner(s) for identifying these requests to ensure consistent and effective implementation.

GUIDELINES

NOT IMPLEMENTED

A finding of this type may indicate little to no reduction in risk to minor athletes and can be a result of, but not limited to the following:

- Complete absence of policies and/or relevant and supporting documentation where required.
- Complete absence of communication to Applicable Adults regarding specific policy/requirements.
- Complete absence of reporting and oversight structure for Required Prevention Policy violations.
- Less than 70% compliance on Education & Training requirements.
- Two or more groups of individuals required to meet Education & Training requirements were not properly identified.

PARTIALLY IMPLEMENTED

A finding of this type may indicate limited reduction in risk to minor athletes and can be a result of, but 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 Applicable Adults regarding policy/requirements.
- Lack of an adequate reporting and oversight structure for Required Prevention Policy violations.
- Between 70% and 90% compliance on Education & Training requirements.
- One group of individuals required to meet Education & Training requirements were not properly identified.

IMPLEMENTED

A finding of this type may indicate reduced risk to minor athletes and can be a result of, but not limited to the following:

- Presence of policies and all relevant and supporting documentation provided where required.
- Adequate and consistent communication to Applicable Adults.
- Adequate reporting and oversight structure for Required Prevention Policy violations.
- 90% or higher compliance on Education & Training requirements.
- All groups of individuals required to meet Education & Training requirements were properly identified.