



United States Olympic Committee

United States Olympic Committee SafeSport Audit of US Bowling Congress

October 2017

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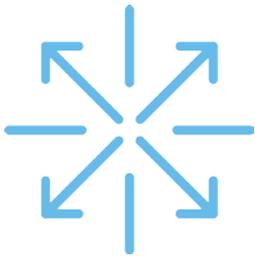


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¹ To consider the report in its entirety, please refer also to the detailed management response that will appear here [[Governance Documents](#)] within 90 days of the date of this report.



Executive Summary

Summary Observations

It shall be the policy of the United States Olympic Committee (USOC) that each National Governing Body (NGBs) adopt a Minimum Standards Policy for Athlete Safety Programs (Athlete Safety Standards) by December 31, 2013².

We noted the following opportunities to enhance the design of US Bowling Congress' (USBC) compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Education and Training Testing** – All ten individuals selected for testing (100% of the selected individuals) did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the individuals completed the education and training requirements prior to issuing the audit report.
- > **Athlete Safety Standards - Application of the SafeSport Policy** – The USBC's SafeSport-related documentation and administrative materials only applies to athletes of a certain age. The USBC's SafeSport policy states that the policies and procedures apply to 'Athletes' as defined in USBC bylaws, Art. IX, B. The USBC bylaws defines the term 'athletes' as "an individual, at least 18 years of age, and meets the qualifications of at least one of the two following constituencies: 1) Team USA Athlete, 2) Actively Engaged Athletes."

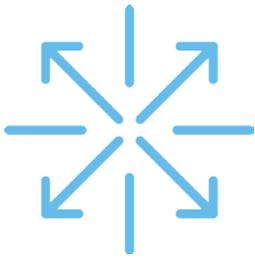
Background and Approach

USOC engaged Baker Tilly Virchow Krause (Baker Tilly), to assist the USOC in the completion of SafeSport audits, to assess compliance with SafeSport policies and procedures at the USOC and all of its NGBs and High Performance Management Organizations (HPMOs).

Baker Tilly performed a review of USBC to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of USBC:

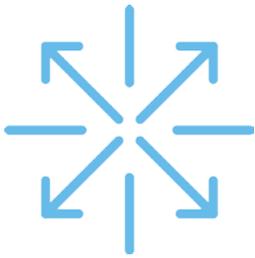
- > Developed and executed an audit program that included:
 - Holding a virtual entrance meeting to discuss and document USBC's SafeSport program and processes.
 - Selecting a sample of 10 from the required individuals to ensure a background check was performed and education and training was completed. See **Appendix A** for a list of documents reviewed.
 - Reviewing USBC's athlete safety policy and determining whether the following was addressed:

² Effective June 20, 2017 the USOC replaced the Athlete Safety Standards with the NGB Athlete Safety Policy. Due to the timing of this audit, fieldwork was performed in accordance with the Athlete Safety Standards.



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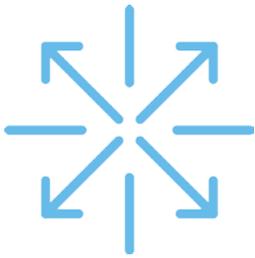
- Required misconduct is prohibited and defined;
 - Reporting procedures are documented; and
 - The grievance process is documented and complies with Athlete Safety Standards.
- Identifying which individuals are required to undergo a criminal background check and complete education and training.
- > Conducted a virtual exit meeting, if requested, following delivery of the draft report, to discuss audit findings and recommendation(s) with USBC. See **Appendix B** for a list of individuals interviewed.
 - > Identified specific observations and recommendations regarding opportunities to enhance compliance with Athlete Safety Standards. Observations include the following attributes: criteria, condition, cause, effect and recommendation, as set out in the International Professional Practices Framework (IPPF) Standards and Practice Advisory 2410-1.



Detailed Report

The table below represents opportunities to enhance the design and effectiveness of USBC’s compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Education and Training Testing	
Criteria	The Athlete Safety Standards state each NGB/HPMO shall require education and training for those individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.
Condition	All ten individuals selected for testing (100% of the selected individuals) did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the individuals completed the education and training requirements prior to issuing the audit report.
Cause	USBC may not be consistently tracking and monitoring compliance with the education and training requirements of the Athlete Safety Standards. Per discussion with USA Bowling personnel, USA Bowling was unable to locate supporting documentation for the selected individuals' education and training requirements.
Effect	Individuals the USBC formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes may not be in compliance with the SafeSport program because they have not completed education and training prior to having contact with athletes. USBC must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding. Also, athletes may have contact with individuals who are unaware of SafeSport misconduct and the potential impact to athletes' well-being and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.
Recommendation	USBC must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete education and training requirements in a timely manner and before they have contact with athletes to provide assurance that they are educated on the requirements of the Athlete Safety Standards. The USBC must consistently track and verify education and training requirements are met for all Required

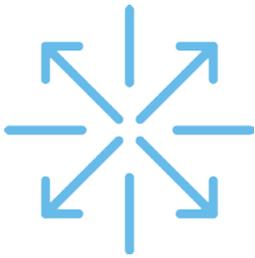


1. Athlete Safety Standards - Education and Training Testing

	<p>Individuals. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>USBC should review the testing results and require all necessary individuals to complete the necessary requirements (i.e., education and training).</p>
<p>Management response</p>	<p>USBC has been actively engaged with SafeSport Education and Training since the program's inception in 2013. Hundreds USBC of athletes and coaches have used the training portal. However, due to an administrative error, USBC is unable to locate supporting documentation for the audit period.</p> <p>Therefore, we agree with the condition and recommendation and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90 day timeline referenced above.</p>

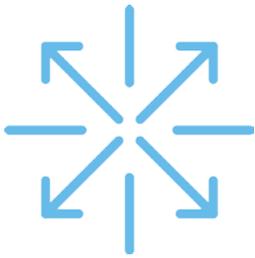
2. Athlete Safety Standards - Application of the SafeSport Policy

<p>Criteria</p>	<p>The Athlete Safety Standards are not age specific. The Athlete Safety Standards state that the policy shall apply to (1) USBC employees; (2) athletes the USBC designates for the USADA required testing pool (RTP); and (3) individuals the USBC formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.</p>
<p>Condition</p>	<p>The USBC's SafeSport-related documentation and administrative materials only applies to athletes of a certain age. The USBC's SafeSport policy states that the policies and procedures apply to 'Athletes' as defined in USBC bylaws, Art. IX, B. The USBC bylaws defines the term 'athletes' as "an individual, at least 18 years of age, and meets the qualifications of at least one of the two following constituencies: 1) Team USA Athlete, 2) Actively Engaged Athletes."</p>
<p>Cause</p>	<p>USBC may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.</p>
<p>Effect</p>	<p>USBC may not be in compliance with the Athlete Safety Standards. USBC must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result</p>



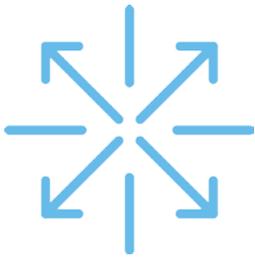
2. Athlete Safety Standards - Application of the SafeSport Policy

	<p>in disciplinary action by the USOC including withdrawal of high performance funding.</p> <p>Additionally, athletes under 18 years old may not be aware of SafeSport policies and procedures, including SafeSport-related misconduct.</p>
Recommendation	<p>USBC must update its SafeSport-related documentation and administrative materials to include all athletes, not only those who are at least 18 years of age. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>For example, the following language could be used:</p> <p>The SafeSport policy applies to (1) USBC employees; (2) athletes the USBC designates for the USADA required testing pool (RTP); and (3) individuals the USBC formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.</p>
Management response	<p>We agree with the condition and recommendation and will respond to the USOC with documentation of adjustments to the SafeSport policy clarifying the age provision to ensure compliance with the current NGB Athlete Safety Policy. Our documentation will be submitted to the USOC within the 90 day timeline referenced above.</p>



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Report Appendices



Appendix A: Documents Reviewed

We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of “required individuals”(i.e., covered individuals required to undergo background check and training)
- > US Bowling Congress Association Policy Manual
- > SafeSport Code for the U.S. Olympic and Paralympic Movement
- > US Bowling Congress Bylaws
- > US Bowling Congress Coaches' Code of Conduct
- > US Bowling Congress Athlete's' Code of Conduct



Appendix B: Personnel Interviewed

We interviewed the following personnel:

- > Jason Overstreet, Deputy Executive Director