



# United States Olympic Committee

## United States Olympic Committee SafeSport Audit of U.S. Figure Skating

October 2017

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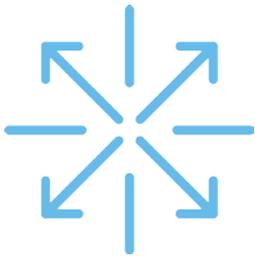


**BAKER TILLY**

Candor. Insight. Results.

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United States Olympic Committee  
USOC SafeSport Audit of U.S. Figure Skating

# United States Olympic Committee SafeSport Audit of U.S. Figure Skating<sup>1</sup>

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<sup>1</sup> 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

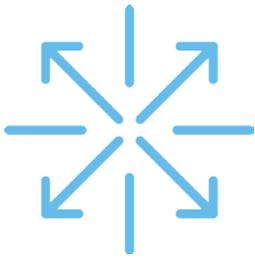
It shall be the policy of the United States Olympic Committee (USOC) that each National Governing Body (NGBs) adopt a Minimum Standards Policy for Athlete Safety Programs (Athlete Safety Standards) by December 31, 2013<sup>2</sup>.

We noted the following opportunities to enhance the design of U.S. Figure Skating's compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – One individual selected for testing (10% of the selected individuals) did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017).
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements** – U.S. Figure Skating's policy does not specifically state all of the required stakeholders that must have complete SafeSport training. U.S. Figure Skating policy does not specifically state individuals that are required to take these trainings and uses the following language in its SafeSport Handbook (dated July 17, 2014) to indicate those who should be required (or those who may be "strongly encouraged") to take the training:
  - "It is strongly encouraged that those participants who have direct contact with or supervision over minor participants, are responsible for enforcing child abuse and misconduct policies and are in managerial or supervisory roles of U.S. Figure Skating programs, shall complete appropriate awareness training about child physical and sexual abuse and other types of misconduct before having contact with youth participants."
  - "The training videos in total are approximately 90 minutes long. Each member club is highly encouraged to have at least three representatives complete the online training each year including the Club SafeSport Compliance Chair."
  - "This SafeSport Handbook, originally created by the U.S. Olympic Committee, [www.safesport.org](http://www.safesport.org), and adapted by U.S. Figure Skating, includes various guidelines that apply to all U.S. Figure Skating clubs, programs, events and activities." It further includes the available and required training of coaches and select U.S. Figure Skating volunteers, officials and staff members on recognizing and reducing circumstances for potential abuse to occur.

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<sup>2</sup> 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.

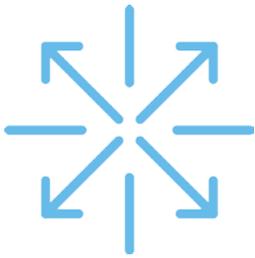


## Background and Approach

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 U.S. Figure Skating to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of U.S. Figure Skating:

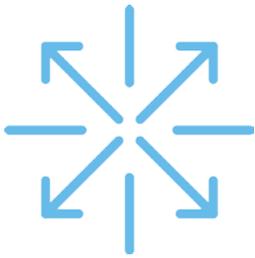
- > Developed and executed an audit program that included:
  - Holding a virtual entrance meeting to discuss and document U.S. Figure Skating's SafeSport program and processes.
  - Selecting a sample of 10 from the required individuals to ensure a background check was performed and education and training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

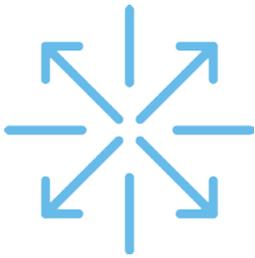
The table below represents opportunities to enhance the design and effectiveness of U.S. Figure Skating's compliance with the Athlete Safety Standards.

<b>1. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing</b>	
<b>Criteria</b>	The Athlete Safety Standards states each NGB/HPMO shall require criminal background checks and 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.
<b>Condition</b>	One individual selected for testing (10% of the selected individuals) did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017).
<b>Cause</b>	<p>U.S. Figure Skating may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.</p> <p>Per discussion with U.S. Figure Skating personnel, the selected individual is the President a club and there is no record during the testing period indicating that he completed a SafeSport course. Based on communications with U.S. Figure Skating, they reviewed the club's roster and do not see that the club has a specific person designated as a SafeSport compliance chair. If a club does not have a designated individual, then the club's President assumes this duty. Based on discussions with U.S. Figure Skating, it was noted that they have informed the selected individual to take the USOC course immediately, but it was not completed prior to issuing the audit report.</p>
<b>Effect</b>	Individuals U.S. Figure Skating 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 USOC's SafeSport program because they have not completed criminal background checks and/or education and training prior to having contact with athletes. U.S. Figure Skating 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.

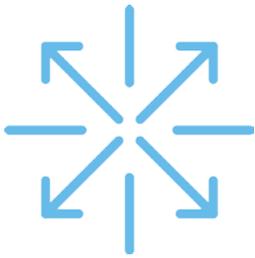


1. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
<b>Recommendation</b>	<p>U.S. Figure Skating must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete criminal background checks and 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. U.S. Figure Skating must consistently track and verify criminal background checks and education and training requirements are met for all Required Individuals. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>U.S. Figure Skating should review the testing results and require all necessary individuals to complete the necessary requirements (i.e., criminal background check and/or education and training).</p>
<b>Management response</b>	<p>U.S. Figure Skating agrees to update its SafeSport Handbook to correspond with the USOC's updated NGB Athlete Safety Policy (dated June 20, 2017) and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. U.S. Figure Skating's plan will be submitted to the USOC within the 90 day timeline referenced above.</p>

2. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
<b>Criteria</b>	<p>The Athlete Safety Standards states each NGB/HPMO shall require criminal background checks and 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.</p>
<b>Condition</b>	<p>U.S. Figure Skating's policy does not specifically state all of the required stakeholders that must complete SafeSport training. U.S. Figure Skating policy does not specifically state individuals that are required to take these trainings and uses the following language to indicate those who should be required (or those who may be "strongly encouraged") to take the training:</p> <ul style="list-style-type: none"> <li>- " It is strongly encouraged that those participants who have direct contact with or supervision over minor participants, are responsible for enforcing child abuse and misconduct policies and are in managerial or supervisory roles of U.S. Figure Skating programs, shall complete appropriate awareness training about child physical and sexual abuse and other types of misconduct before having contact with youth participants."</li> <li>- "The training videos in total are approximately 90 minutes long. Each member club is highly encouraged to have at least three</li> </ul>



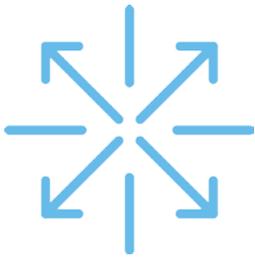
2. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
	<p>representatives complete the online training each year including the Club SafeSport Compliance Chair."</p> <p>- "This SafeSport Handbook, originally created by the U.S. Olympic Committee, <a href="http://www.safesport.org">www.safesport.org</a>, and adapted by U.S. Figure Skating, includes various guidelines that apply to all U.S. Figure Skating clubs, programs, events and activities." It further includes the available and required training of coaches and select U.S. Figure Skating volunteers, officials and staff members on recognizing and reducing circumstances for potential abuse to occur.</p>
<b>Cause</b>	<p>U.S. Figure Skating may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.</p>
<b>Effect</b>	<p>U.S. Figure Skating may not be in compliance with the Athlete Safety Standards. U.S. Figure Skating 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.</p> <p>Additionally, stakeholders (e.g., coaches, staff, officials, volunteers, etc.) may not know that criminal background checks and education and training requirements apply to them or be informed of SafeSport initiatives and the related misconduct areas. 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.</p>
<b>Recommendation</b>	<p>U.S. Figure Skating's SafeSport policy 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 criminal background checks and 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. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p>
<b>Management response</b>	<p>U.S. Figure Skating agrees to update its SafeSport Handbook to correspond with the USOC's updated NGB Athlete Safety Policy (dated June 20, 2017) 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>



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## Report Appendices

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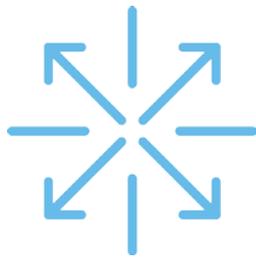


## Appendix A: Documents Reviewed

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We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of “required individuals”(i.e., covered individuals defined by the NGB who are required to undergo background check and training)
- > The 2017 Official U.S. Figure Skating Rulebook
- > US Figure Skating SafeSport Program Handbook



## Appendix B: Personnel Interviewed

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We interviewed the following personnel:

- > David Raith, Executive Director
- > Susi Wehrli-McLaughlin, Senior Director, Membership
- > Barbara Reichert, Senior Director, External Relations