



United States Olympic Committee

United States Olympic Committee SafeSport Audit of US Tennis Association

October 2017

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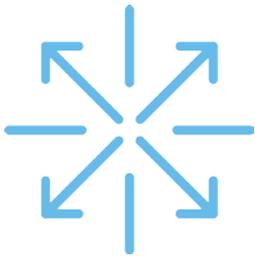


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¹ To consider the report in its entirety, please refer also to the detailed management response that will appear here [[Governance Documents](#)] within 90 days of the date of this report.



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 Tennis Association's (USTA) compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Education and Training Testing** - Two individuals selected for testing (20% 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 education and training requirements were completed prior to issuing the audit report.
- > **Athlete Safety Standards - Application of the SafeSport Policy** - USTA's SafeSport-related documentation and administrative materials does not specifically indicate that the overall policy applies to athletes designated for the USADA registered testing pool.

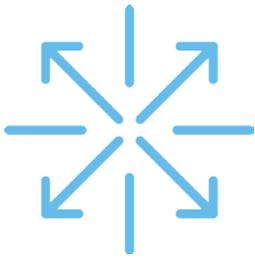
Background and Approach

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).

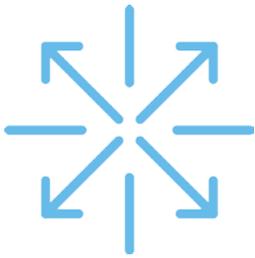
Baker Tilly performed a review of USTA to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of USTA:

- > Developed and executed an audit program that included:
 - Holding a virtual entrance meeting to discuss and document USTA's SafeSport program and processes.
 - Selecting a sample of ten 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 USTA'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.

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.



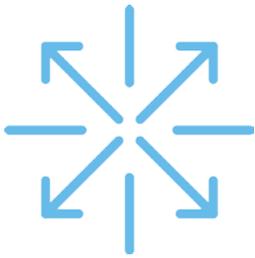
- Identifying which individuals are required to undergo a criminal background check and complete education and training.
- > Conducted a virtual exit meeting, if requested, following delivery of the draft report, to discuss audit findings and recommendation(s) with USTA. See **Appendix B** for a list 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 tables below represent opportunities to enhance the design and effectiveness of USTA's compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Education and Training Testing	
Criteria	The Athlete Safety Standards states 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	Two individuals selected for testing (20% 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 education and training requirements were completed prior to issuing the audit report.
Cause	USTA's manual verification process for tracking and monitoring compliance of the education and training requirements of the Athlete Safety Standards may need to be evaluated.
Effect	<p>Individuals USTA 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 education and training prior to having contact with athletes. USTA 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>Also, athletes may have contact with individuals who are unaware of SafeSport misconduct and the potential impact to athletes' well-being, which could put athletes at SafeSport-related misconduct risk.</p>
Recommendation	<p>USTA 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. USTA must consistently track and verify 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>USTA should review the testing results and require all necessary individuals to complete the necessary requirements</p>

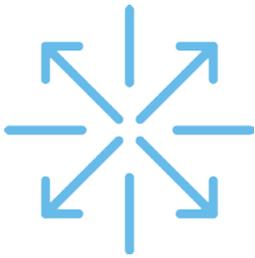


1. Athlete Safety Standards - Education and Training Testing

	(i.e., education and training).
Management response	<p>In regard to the education and training, since the current SafeSport training platform cannot integrate to the USTA registration and tracking systems, much of the tracking and oversight for the 18,000 USTA users must be managed manually. On November 6, 2017, the U.S. Center for SafeSport is expected to release its new learning management system which will provide the USTA the first opportunity to integrate the online training and education into the USTA’s existing registration and relevant member management systems, including an automated verification functionality. Once linked, the USTA is confident that education and training requirements will be tracked more efficiently, leading to greater compliance. Until the integration occurs, the USTA will continue to actively communicate and follow-up with those individuals who have not completed the education module.</p> <p>We agree with the 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>

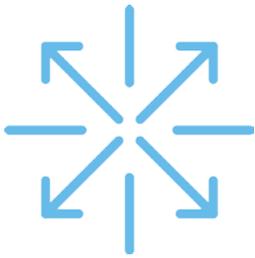
2. Athlete Safety Standards - Application of the SafeSport Policy

Criteria	The Athlete Safety Standards states that the policy shall apply to (1) NGB employees; (2) athletes the NGB designates for the USADA required testing pool (RTP); and (3) individuals the NGB formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.
Condition	USTA’s SafeSport-related documentation and administrative materials does not specifically indicate that the overall policy applies to athletes designated for the USADA registered testing pool.
Cause	USTA may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.
Effect	<p>USTA may not be in compliance with the Athlete Safety Standards. USTA 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, certain athletes may not be aware that they must comply with SafeSport-related policies, processes, and</p>



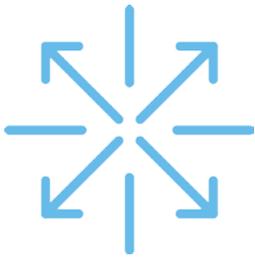
2. Athlete Safety Standards - Application of the SafeSport Policy

	procedures.
Recommendation	<p>USTA must update their SafeSport-related documentation and administrative materials to include the policy applies to athletes USTA designates for the USADA required testing pool (RTP). 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 in place of the current policy language, "The policy shall apply to (1) NGB employees; (2) athletes the NGB designates for the USADA required testing pool (RTP); and (3) individuals the NGB formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes."</p>
Management response	<p>The USTA's Membership Terms and Conditions for all members (athlete or otherwise) provides notice that members are subject to the USADA Protocol and Safe Sport Policies. The Athletes the USTA designates to participate on behalf of the USA in international competition (and accordingly designates as subject to the USADA required testing pool) are professional tennis players who may not hold a USTA membership and therefore may otherwise be outside of the USTA's jurisdiction. To the extent the USTA has authority over these individuals (during international team competitions), USTA agrees to make clear that by dint of their participation, these individuals are subject to the SafeSport policies.</p> <p>We agree with the recommended action of providing stronger communication to Elite Athletes participating in international competition and will suggest the following language be included in materials such as the Olympic package sent to USA Team members: "The USTA is required by the USOC to make its Team USA Members subject the USTA's SafeSport related policies, as described at: https://www.usta.com/en/home/about-usta/who-we-are/national/safe-play-conduct--policies---guidelines.html." The USTA 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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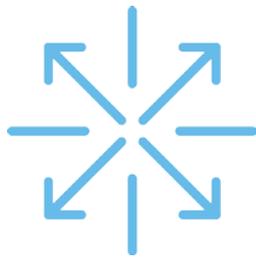
Report Appendices



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)
- > SafeSport Policy documentation
- > USTA Constitution, Bylaws and Diversity & Inclusion Statement
- > USTA Safe Play Webpage / Policy



Appendix B: Personnel Interviewed

We interviewed the following personnel:

- > Rachel Booth, Senior Counsel
- > Lauren Tracy, SafeSport Liaison and Director of Strategic Initiatives