



United States Olympic Committee

United States Olympic Committee SafeSport Audit of USA Golf

October 2017

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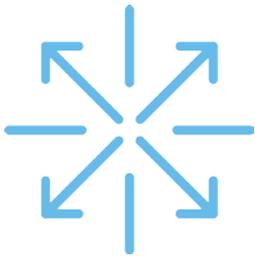


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¹ To consider the report in its entirety, please refer also to the detailed management response that will appear here [[Governance Documents](#)] within 90 days of the date of this report.



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 USA Golf's compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements** – USA Golf's SafeSport-related documentation and administrative materials does not specifically require stakeholders (e.g., coaches, staff, officials, volunteers, etc.) to complete education and training requirements as required by the Athlete Safety Standards.
- > **Athlete Safety Standards - Reporting and Grievance Processes** – USA Golf's SafeSport policy does not provide a grievance process.
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – Three 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).

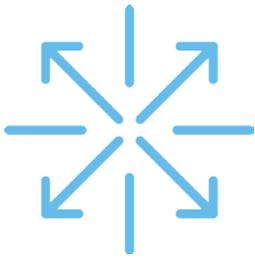
Background and Approach

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 USA Golf to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of USA Golf:

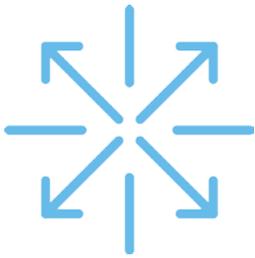
- > Developed and executed an audit program that included:
 - Holding a virtual entrance meeting to discuss and document USA Golf's SafeSport program and processes.
 - Selecting a sample of three from the required individuals to ensure a background check was performed and education and training was completed.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

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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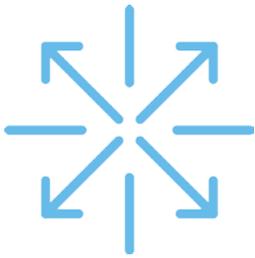
- Reporting procedures are documented; and
- The grievance process is documented and complies with Athlete Safety Standards.
 - Identifying which individuals are required to undergo a criminal background check and complete education and training.
- > Conducted a virtual exit meeting, if requested, following delivery of the draft report, to discuss audit findings and recommendation(s) with USA Golf. 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 USA Golf's compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
Criteria	The Athlete Safety Standards state 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.
Condition	USA Golf's SafeSport-related documentation and administrative materials do not specifically require stakeholders (e.g., coaches, staff, officials, volunteers, etc.) to complete education and training requirements as required by the Athlete Safety Standards.
Cause	<p>USA Golf may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.</p> <p>Per review of the USA Golf SafeSport Policy, Section V. Education and Training indicates that, "If and when USA GOLF expands to include players, coaches, or multiple employees, USA GOLF will develop an awareness training concerning misconduct. This training will focus on the six categories of misconduct:</p> <ol style="list-style-type: none"> (1) Sexual misconduct, including child sexual abuse (2) Emotional misconduct (3) Physical misconduct (4) Bullying (5) Harassment (6) Hazing"
Effect	<p>USA Golf may not be in compliance with the Athlete Safety Standards. NGBs/HPMOs 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</p>

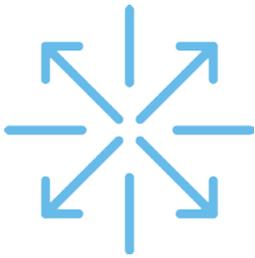


1. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements

	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	USA Golf'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.
Management response	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.

2. Athlete Safety Standards - Reporting and Grievance Processes

Criteria	The Athlete Safety Standards state each NGB shall have a grievance process, which is materially free of bias and conflicts of interest, to address allegations of misconduct following the report or complaint of misconduct which has not been adjudicated under a criminal background check.
Condition	USA Golf's SafeSport policy does not provide a grievance process.
Cause	Each NGB/HPMO may not have reviewed and updated its SafeSport-related documentation and administrative materials to include all of the requirements in the Athlete Safety Standards. Per review of the USA Golf SafeSport Policy, Section VII. Enforcement, "If and when USA Golf expands to include players, coaches, or multiple employees, the USA Golf Board of Directors shall establish a grievance process to address allegations of misconduct following a report or complaint of misconduct. Such proceedings shall be held in front of an independent panel appointed by the Board of Directors. This panel shall be composed of disinterested members to ensure all reviews are materially free of bias and conflicts of interest."

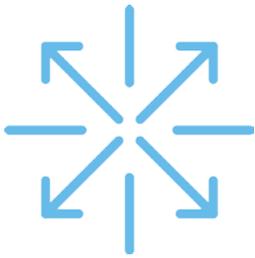


2. Athlete Safety Standards - Reporting and Grievance Processes

Effect	<p>NGBs/HPMOs 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>If there is not a comprehensive grievance process documented, athletes or stakeholders (e.g., coaches, officials) may be deterred from reporting a SafeSport-related concern.</p>
Recommendation	<p>USA Golf must update their SafeSport-related documentation and administrative materials to include a grievance process as documented in the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p>
Management response	<p>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>

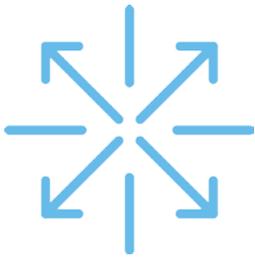
3. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing

Criteria	<p>The Athlete Safety Standards state 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 (Required Individuals).</p>
Condition	<p>Three 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).</p>
Cause	<p>NGB/HPMO may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.</p>
Effect	<p>Individuals the NGB/HPMO 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. NGBs/HPMOs must be in compliance with the USOC's Athlete Safety</p>



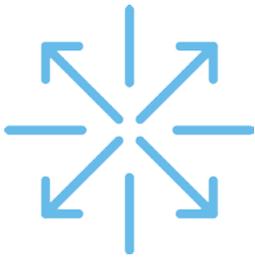
3. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing

	<p>Standards to be a member in good standing. Noncompliance with the USOC’s 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 and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.</p>
Recommendation	<p>USA Golf 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. USA Golf 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>USA Golf 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>
Management response	<p>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>



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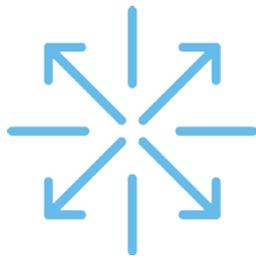
Report Appendices



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)
- > USA Golf SafeSport Policy
- > Bylaws of USA Golf Federation, Inc.



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Appendix B: Personnel Interviewed

We interviewed the following personnel:

- > Andy Levinson, Executive Director