



# United States Olympic Committee

## United States Olympic Committee SafeSport Audit of USA Surfing

August 2018

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# Contents

<b>UNITED STATES OLYMPIC COMMITTEE SAFESPORT AUDIT OF USA SURFING</b> .....	<b>3</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>4</b>
SUMMARY OBSERVATIONS .....	4
BACKGROUND AND APPROACH .....	5
<b>DETAILED REPORT</b> .....	<b>6</b>
<b>REPORT APPENDICES</b> .....	<b>9</b>
<b>APPENDIX A: DOCUMENTS REVIEWED</b> .....	<b>10</b>
<b>APPENDIX B: PERSONNEL INTERVIEWED</b> .....	<b>11</b>



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# 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 (NGB Athlete Safety Policy) by December 31, 2013<sup>1</sup>.

We noted the following opportunities to enhance the design of USA Surfing's compliance with the 2017 NGB Athlete Safety Policy:

- > **NGB Athlete Safety Policy - Criminal Background Checks and Education and Training Testing** - Requiring criminal background checks, at least every two years, and education and training is not consistently enforced by USA Surfing. The following exceptions were identified during our testing:
  - Eight individuals selected for testing (80% of the selected individuals) did not have criminal background checks conducted during the testing period (i.e., April 1, 2017 through March 30, 2018); however, evidence was provided that all of the individuals selected for testing had completed the background check requirements prior to issuing the audit report.
  - Two individuals selected for testing (20% of the selected individuals) did not complete education and training requirements during the testing period (i.e., April 1, 2017 through March 30, 2018); however, evidence was provided that both of the individuals selected for testing had completed the education and training requirements prior to issuing the audit report.

During our review, we also tested compliance with the new NGB Athlete Safety Policy requirements that must be included in each NGB's SafeSport Policy by September, 2018. USA Surfing's policies and procedures met the requirements of the new NGB Athlete Safety Policy. Therefore, no other observations were noted during this audit.

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<sup>1</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 NGB Athlete Safety Policy.



## 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 Surfing to evaluate compliance with the NGB Athlete Safety Policy. The following activities were performed for this review of USA Surfing:

- > Developed and executed an audit program that included:
  - Holding a virtual entrance meeting to discuss and document USA Surfing's SafeSport program and processes.
  - Selecting a sample of 10 from the required individuals to determine whether a background check was performed and education and training was completed. See **Appendix A** for a list of documents reviewed.
  - Reviewing USA Surfing'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 the NGB Athlete Safety Policy.
  - 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 Surfing. See **Appendix B** for a list of individuals interviewed.
- > Identified specific observations and recommendations regarding opportunities to enhance compliance with NGB Athlete Safety Policy. 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 Surfing's compliance with the 2017 NGB Athlete Safety Policy.

1. NGB Athlete Safety Policy – Criminal Background Checks and Education and Training Testing	
<b>Criteria</b>	The 2017 NGB Athlete Safety Policy states each NGB/HPMO shall require criminal background checks, at least every two years, 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>	<p>Requiring criminal background checks, at least every two years, and education and training is not consistently enforced by USA Surfing. The following exceptions were identified during our testing:</p> <ol style="list-style-type: none"> <li>Eight individuals selected for testing (80% of the selected individuals) did not have criminal background checks conducted during the testing period (i.e., April 1, 2017 through March 30, 2018); however, evidence was provided that all of the individuals selected for testing had completed the background check requirements prior to issuing the audit report.</li> <li>Two individuals selected for testing (20% of the selected individuals) did not complete education and training requirements during the testing period (i.e., April 1, 2017 through March 30, 2018); however, evidence was provided that both of the individuals selected for testing had completed the education and training requirements prior to issuing the audit report.</li> </ol>
<b>Cause</b>	USA Surfing may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the NGB Athlete Safety Policy.
<b>Effect</b>	<p>Individuals USA Surfing 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. USA Surfing must be in compliance with the NGB Athlete Safety Policy to be a member in good standing. Noncompliance with the NGB Athlete Safety Policy 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</p>



1. NGB Athlete Safety Policy – Criminal Background Checks and Education and Training Testing	
	have a criminal history, which could put athletes at SafeSport-related misconduct risk.
<b>Recommendation</b>	<p>USA Surfing 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 NGB Athlete Safety Policy. USA Surfing must consistently track and verify criminal background checks and education and training requirements are met for all required individuals.</p> <p>USA Surfing should review the testing results and require all covered individuals to complete the necessary requirements (i.e., criminal background check and/or education and training). Compliance with these requirements for all individuals USA Surfing formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes must be completed within 90 days of receipt of the final audit report.</p>
<b>Management response</b>	<p>As the new USOC NGB Athlete Safety Policy requirements have been evolving, so have the policies (as a newly formed 2017 NGB) of USA Surfing. Prior to the audit testing period, USA Surfing had trained and checked a very small number of personnel (initial personnel group) prior to March 30, 2018 when the CEO underwent testing prior to attending the 2018 Winter Olympics. Our two coaches were brought on having been previously background checked (as part of their personal occupational careers) under more rigorous "live scan fingerprint" background check standards than the NCSI service USA Surfing now uses exclusively. The small initial personnel group consisting of the CEO, President, medical director and head coach were all SafeSport trained earlier as well, under the old SafeSport training program/certificate. At the time, as a new NGB, USA Surfing SafeSport policies were basic, deferring to USOC SafeSport policy via USOC-recommended wording/clause in the USA Surfing bylaws.</p> <p>USA Surfing has since adopted policies that require background checks and SafeSport training of covered individuals every two years, to be completed before contact with athletes begins and within 60 days of taking on a new role. An internal audit will be performed bi-annually to ensure required checks and training have been completed. Such training and background checks are easily accessible via an online portal on the USA Surfing website and the list of covered individuals has been expanded to include not only individuals it formally authorizes, approves, or appoints</p>



### 1. NGB Athlete Safety Policy – Criminal Background Checks and Education and Training Testing

to a position of authority over, or to have frequent contact with athletes, but to the Board of Directors as well. USA Surfing has chosen NCSI (as the USOC recommended background check service) as its official background check service.

All covered individuals (including those found missing in the audit) have been NCSI background checked and confirmation has been sent to Baker Tilly. As part of USA Surfing's SafeSport policy updates, the coaches were also required to be re-checked via NCSI in order to be compliant with USA Surfing NCSI exclusivity rules.

The two SafeSport trainings found incomplete have also been rectified. Both of the individuals (one had 1/3 complete and the other had 2/3) were unaware that the new SafeSport training format was a three-part course. Both have since completed all three parts.



United States Olympic Committee  
USOC SafeSport Audit of USA Surfing

## Report Appendices

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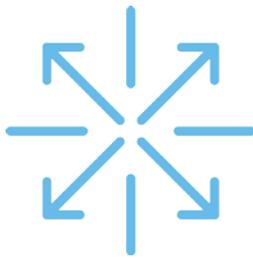


## Appendix A: Documents Reviewed

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We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Bylaws of USA Surfing, INC.
- > Population listing of “required individuals” (i.e., covered individuals required to undergo background check and training)
- > SafeSport Code for the U.S. Olympic and Paralympic Movement
- > USA Surfing Safe Sport Policy



## Appendix B: Personnel Interviewed

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We interviewed the following personnel:

- > Greg Cruse, Chief Executive Officer
- > Andrea Swayne, President/Chairwoman