



# **United States Olympic Committee**

**United States Olympic Committee SafeSport Audit  
of USA Synchronized Swimming**

September 2017



Candor. Insight. Results.

# Contents

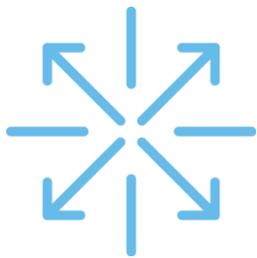
<b>UNITED STATES OLYMPIC COMMITTEE SAFESPORT AUDIT OF USA SYNCHRONIZED SWIMMING .....</b>	<b>3</b>
<b>EXECUTIVE SUMMARY .....</b>	<b>4</b>
SUMMARY OBSERVATIONS .....	4
BACKGROUND AND APPROACH .....	5
<b>DETAILED REPORT .....</b>	<b>6</b>
<b>REPORT APPENDICES .....</b>	<b>12</b>
<b>APPENDIX A: DOCUMENTS REVIEWED .....</b>	<b>13</b>
<b>APPENDIX B: PERSONNEL INTERVIEWED .....</b>	<b>14</b>



United States Olympic Committee  
USOC SafeSport Audit of USA Synchronized Swimming

# **United States Olympic Committee SafeSport Audit of USA Synchronized Swimming**

---



## Executive Summary

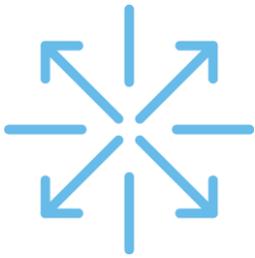
### Summary Observations

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>1</sup>.

We noted the following opportunities to enhance the design of USA Synchronized Swimming (US Synchro) compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Prohibited Conduct** – US Synchronized Swimming's SafeSport-related documentation and administrative materials does not specifically prohibit bullying or define bullying and harassment (including sexual harassment).
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – Requiring criminal background checks and education and training is not consistently enforced by US Synchro. The following exceptions were identified during our testing:
  - Four individuals selected for testing (40% of the selected individuals) did not complete criminal background checks during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the criminal background checks were completed 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., May 1, 2016 through April 30, 2017); however, evidence was provided that one of the individuals completed the education and training requirements prior to issuing the audit report.
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements** – US Synchronized Swimming's SafeSport-related documentation and administrative materials does not require individuals it formally authorized, approved, or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes (Required Individuals) to complete education and training requirements. US Synchronized Swimming's SafeSport Explanation Training document indicates, "We believe you will find the training very valuable and informative, and strongly encourage you to complete this course."
- > **Athlete Safety Standards - Application of the SafeSport Policy (Minors)** – US Synchronized Swimming's Abuse and Harassment Policy, Article 4 states that US Synchronized Swimming, "will not authorize or sanction, in programs that it directly controls, the participation of any volunteer, chaperone, coach, manager or employee who has routine access to children (anyone under the

<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 Athlete Safety Standards.



age of majority) who refuses to consent to a background check by USSS before s/he is allowed to have routine access to children in USSS programs." US Synchronized Swimming's application of this policy is inconsistent with the requirements listed in the Athlete Safety Standards and may be focused too narrowly on minors. The Athlete Safety Standards do not limit these activities to include only minors.

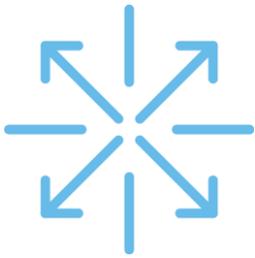
- > **Athlete Safety Standards - Application of the SafeSport Policy** – US Synchronized Swimming's SafeSport-related documentation and administrative materials does not specifically indicate that the overall policy applies to athletes designated for the USADA registered testing pool.

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

- > Developed and executed an audit program that included:
  - Holding a virtual entrance meeting to discuss and document USA Synchro'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 USA Synchro'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 USA Synchro. 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 USA Synchro's compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Prohibited Conduct	
<b>Criteria</b>	The Athlete Safety Standards require that each NGB/HPMO shall adopt an athlete safety program that prohibits and defines the following misconduct: bullying, hazing, harassment (including sexual harassment), emotional Misconduct, physical misconduct, and sexual misconduct (including child sexual abuse).
<b>Condition</b>	US Synchronized Swimming's SafeSport-related documentation and administrative materials does not specifically prohibit bullying or define bullying and harassment (including sexual harassment).
<b>Cause</b>	USA Synchro may not have reviewed and updated its SafeSport-related documentation and administrative materials to include all of the requirements in the Athlete Safety Standards.
<b>Effect</b>	<p>USA Synchro 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 be aware of the specific requirements of the Athlete Safety Standards and could be out of compliance with the requirements and/or may not be aware of the prohibited conduct. Also, athletes may have contact with stakeholders who are not aware of SafeSport misconduct and the potential impact to athletes' well-being.</p>
<b>Recommendation</b>	USA Synchro must update all applicable SafeSport-related documentation and administrative materials to define and specifically prohibit the six types of prohibited misconduct identified in the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.
<b>Management response</b>	We agree with the condition and recommendation. September is our legislation time and we are currently reviewing our rules and appendices. We will include the recommendation within the next 90 days and these will be posted on website and communicated to the membership.



2. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
<b>Criteria</b>	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.
<b>Condition</b>	<p>Requiring criminal background checks and education and training is not consistently enforced by USA Synchro. The following exceptions were identified during our testing:</p> <ol style="list-style-type: none"> <li>1. Four individuals selected for testing (40% of the selected individuals) did not complete criminal background checks during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the criminal background check were completed prior to issuing the audit report.</li> <li>2. 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 one of the individuals completed the education and training requirements prior to issuing the audit report.</li> </ol>
<b>Cause</b>	USA Synchro may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.
<b>Effect</b>	<p>Individuals USA Synchro 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 criminal background checks and/or education and training prior to having contact with athletes. USA Synchro 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 and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.</p>
<b>Recommendation</b>	USA Synchro 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 Synchro must consistently



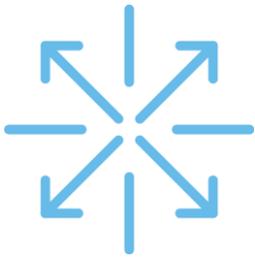
2. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
	<p>track and verify criminal background checks and education and training requirements are met for all required individuals. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>USA Synchro 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>Since the completion of this audit, the above conditions have been fulfilled.</p>

3. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
<b>Criteria</b>	<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.</p>
<b>Condition</b>	<p>US Synchronized Swimming's SafeSport-related documentation and administrative materials do not require individuals it formally authorized, approved, or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes to complete education and training requirements. US Synchronized Swimming's SafeSport Explanation Training document indicates, "We believe you will find the training very valuable and informative, and strongly encourage you to complete this course."</p>
<b>Cause</b>	<p>USA Synchro 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>USA Synchro may not be in compliance with the Athlete Safety Standards. USA Synchro 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</p>



3. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
	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.
<b>Recommendation</b>	USA Synchro'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.
<b>Management response</b>	Since receiving this Audit, the document has been updated, posted on our website and is attached with this communication for your information.

4. Athlete Safety Standards - Application of the SafeSport Policy (Minors)	
<b>Criteria</b>	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.
<b>Condition</b>	US Synchronized Swimming's Abuse and Harassment Policy, Article 4 states that US Synchronized Swimming, "will not authorize or sanction, in programs that it directly controls, the participation of any volunteer, chaperone, coach, manager or employee who has routine access to children (anyone under the age of majority) who refuses to consent to a background check by USSS before s/he is allowed to have routine access to children in USSS programs." US Synchronized Swimming's application of this policy is inconsistent with the requirements listed in the Athlete Safety Standards and may be focused too narrowly on minors. The Athlete Safety Standards do not limit these activities to include only minors.
<b>Cause</b>	USA Synchro may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.

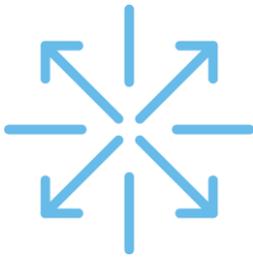


#### 4. Athlete Safety Standards - Application of the SafeSport Policy (Minors)

<p><b>Effect</b></p>	<p>USA Synchro may not be in compliance with the Athlete Safety Standards. USA Synchro 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>
<p><b>Recommendation</b></p>	<p>USA Synchro 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>
<p><b>Management response</b></p>	<p>We agree with the condition and recommendation. September is our legislation time and we are currently reviewing our rules and appendices. We will include the recommendation within the next 90 days and these will be posted on website and communicated to the membership.</p>

#### 5. Athlete Safety Standards - Application of the SafeSport Policy

<p><b>Criteria</b></p>	<p>The Athlete Safety Standards state that the policy shall apply to (1) NGB employees; (2) athletes NGB designates for the USADA required testing pool (RTP); and (3) individuals NGB formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.</p>
<p><b>Condition</b></p>	<p>US Synchronized Swimming'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.</p>
<p><b>Cause</b></p>	<p>USA Synchro may not have updated its SafeSport-related documentation and administrative materials to align with</p>



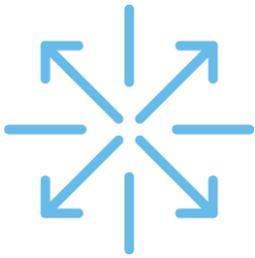
5. Athlete Safety Standards - Application of the SafeSport Policy	
	requirements in the Athlete Safety Standards.
<b>Effect</b>	<p>USA Synchro may not be in compliance with the Athlete Safety Standards. USA Synchro must be in compliance with the Athlete Safety Standards to be a member in good standing. 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 procedures.</p>
<b>Recommendation</b>	<p>USA Synchro must update their SafeSport-related documentation and administrative materials to include the policy applies to athletes USA Synchro 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 NGB designates for the USADA required testing pool (RTP); and (3) individuals NGB formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes."</p>
<b>Management response</b>	<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>



United States Olympic Committee  
USOC SafeSport Audit of USA Synchronized Swimming

## Report Appendices

---

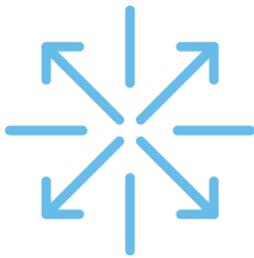


## Appendix A: Documents Reviewed

---

We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of “required individuals” (i.e., covered individuals defined by the NGB who are required to undergo background check and training)
- > USA Synchro SafeSport Explanation Training
- > USA Synchro Appendix Q- Abuse and Harassment Policy



## Appendix B: Personnel Interviewed

---

We interviewed the following personnel:

- > Shari Darst, Executive Director
- > Myriam Glez, Chief Executive Officer